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Electronic Filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: ***Ex Parte***
WC Docket No. 07-38, Development of Nationwide Broadband Data to Evaluate
Reasonable and Timely Deployment of Advanced Services to All Americans, Improvement
of Wireless Broadband Subscribership Data, and Development of Data on Interconnected
Voice over Internet Protocol Subscribership

Dear Ms. Dortch:

Today Eric Einhorn, Vice President - Federal Government Affairs, and I met with Scott Bergmann, Legal Advisor to Commissioner Jonathan Adelstein, to discuss Windstream's position on broadband reporting in the above-referenced docket. Our discussion of the benefits of census tract reporting was consistent with the attached, which we presented to Mr. Bergmann. With respect to costs of census tract reporting, we informed Mr. Bergmann that Windstream would be able to produce broadband subscriber data for census tracts at minimal expense. We explained that Windstream's costs incurred in producing broadband subscriber data by census tract would be comparable to costs incurred in producing broadband subscriber data by ZIP+4. We also noted that any requirements for reporting broadband *availability* data is a wholly different matter than for *subscription* data and could place a significant burden on the company.

Please feel free to contact me if you require additional information.

Sincerely,

/s/

Jennie B. Chandra

cc (by e-mail): Scott Bergmann

Attachment



FORM 477 – CENSUS TRACTS AS A BASIS FOR MEASURING BROADBAND PENETRATION

REPORTING BROADBAND DATA BY CENSUS TRACT IS PREFERABLE TO ZIP+4.

What is a census tract?

A census tract is a common reporting unit for the U.S. Census Bureau. It is a small, relatively permanent statistical subdivision of a county. A census tract generally contains between 1,500 and 8,000 people, with an optimum size of 4,000 people.

Why is reporting by census tracts preferable to reporting by ZIP+4?

1. Ability to correlate broadband data with demographic information

Any broadband data collected on a census tract basis easily can be correlated with U.S. Census demographic information on topics including, but not limited to, age, gender, race, education, and income.

In contrast, data based upon 9-digit ZIP codes cannot be directly correlated with demographic information collected in the U.S. Census. Specifically, there is no correlation between 9-digit ZIP codes and U.S. Census geography. Moreover, the U.S. Census Bureau does not offer crosswalk or relationship files that associate 9-digit ZIP Codes with U.S. Census data.

2. Capacity to be mapped

A census tract is a bounded geographic unit that nests within a single county. Unlike census tracts, 9-digit ZIP codes are not and never have been spatial entities. 9-digit ZIP codes are simply categories for grouping mailing addresses. For example, a 9-digit ZIP code may merely designate a single apartment building, an individual high-volume receiver of mail, or an isolated post office box.

3. Little variation over time

Census tracts are relatively stable over time. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of decennial census data. Census tracts were designed to be relatively homogeneous units with respect to population characteristics, economic status, and living conditions. The U.S. Census Bureau modifies census tracts, at most, only once every ten years.

In contrast, the U.S. Postal Service's list of 9-digit ZIP codes is updated monthly. 9-digit ZIP codes are designed to meet the day-to-day operational needs of the U.S. Postal Service – not to track demographic information.