

COMSTOCK CONSULTING LLC

January 23, 2008

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street SW
Washington, DC 20554

**Re: Federal-State Joint Board on Universal Service: CC Docket No. 96-45 High
Cost Universal Service Support; and WC Docket No. 05-337**

Dear Ms. Dortch:

On behalf of Alltel I met on Tuesday, January 22, with Commissioner Robert McDowell and John Hunter, his chief of staff, to discuss the proceedings listed above. I reviewed the arguments Alltel has previously presented on the record of these proceedings and urged Commissioner McDowell not to vote in favor of a proposed order to implement a cap on Universal Service payments to competitive eligible telecommunications carriers. We also discussed Alltel's long advocated view that the Commission should focus on long-term reform of the Universal Service system as a means to control costs and ensure service to rural consumers.

Respectfully,

/s/ Earl Comstock

Earl W. Comstock
Comstock Consulting LLC
202.255.0273

cc: John Hunter