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

Re: ***Ex Parte Communication***
Windstream Petition for Conversion to Price Cap Regulation
and for Limited Waiver Relief, WC Docket No. 07-171

Dear Ms. Dortch:

On February 1, 2008, Cesar Caballero, Director – Regulatory Law and Policy, and I met by conference call with the Wireline Competition Bureau staff named below to discuss Windstream's petition seeking to convert its rate-of-return study areas to price-cap regulation. During the call we discussed how the per line IAS support described in the Petition should be calculated. The process is detailed in the attached document, which we distributed to the participants and discussed during the call.

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

Sincerely,

/s/

Eric N. Einhorn

cc (by e-mail): Jennifer McKee
Nick Alexander
Marcus Maher
Amy Bender
Doug Slotten
Ted Burmeister
Beth Valinoti

Attachment

Process for Calculating Per Line Interstate Access Support ("IAS")
As Proposed in Windstream Petition¹

1. Calculate a CMT per line per month (equivalent to Average Price Cap CMT Revenue per Line month) for each of the Windstream filing entities consistent with 47 C.F.R. § 61.3(d)(1):
 - a. Calculate 2007 interstate common line revenue requirements for each filing entity pursuant to Parts 32, 36 and 69 of the Commission's rules.
 - b. Subtract 2007 federal universal service contributions from the interstate common line revenue requirements obtained in (a) above in accordance 47 C.F.R. § 61.3(cc).
 - c. Add 2007 interstate switched marketing expense to the interstate common line revenue requirements obtained in (a) in accordance with 47 C.F.R. § 61.3(cc).
 - d. The above calculations [(a) - (b) + (c)] equal the total CMT for each of the Windstream filing entities.
 - e. Divide CMT amounts calculated in (d) by the number of category 1.3 loops as of December 31, 2007, and divide by twelve (12) to arrive at a CMT per line per month amount.

2. Once CMT per line per month (equivalent to Average Price Cap CMT Revenue per Line month) is calculated for each of the Windstream filing entities, IAS support is calculated pursuant to the formula set forth in 47 C.F.R. § 54.804:
 - (a) If CMT per line per month is greater than \$9.20 then: Preliminary Minimum Access Universal Service Support (for a study area) = (CMT per line per month in a study area * price cap local exchange carrier Base Period Lines * 12) - ((\$7.00 * price cap local exchange carrier Base Period Residential and Single-Line Business Lines * 12) + (\$9.20 * price cap local exchange carrier Base Period Multi-line Business Lines * 12).
 - (b) If CMT per line per month in a study area is greater than \$7.00 but less than \$9.20 then: Preliminary Minimum Access Universal Service Support (for a study area) = (CMT per line per month in a study area--\$7.00) * (price cap local exchange carrier Base Period Residential and Single-Line Business Lines * 12).
 - (c) If CMT per line per month in a study area is less than \$7.00 then the Preliminary Minimum Access Universal Service Support (for a study area) is zero.

¹ This document is intended to show how the per line IAS support proposed in the Petition should be calculated and should only be read to suggest a process to implement, rather than modify, the requests for partial waiver proposed in the Petition.

3. Once IAS support is calculated pursuant to (2) above, that support is converted to per line basis and frozen at those levels.
4. Windstream will report access lines to USAC on a quarterly basis beginning in June 2007.