



March 7, 2008

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Portals II, Room TW-A325
Washington, DC 20554

EX PARTE PRESENTATION

Re: *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 (VoIP) Subscribership*

Dear Ms. Dortch:

This is to inform you that on March 6, 2008 the following industry representatives met with Scott Bergmann in connection with the proceeding identified above concerning the Commission's proposal to improve its collection of information on the deployment of broadband services:

Curt Stamp (Independent Telephone & Telecommunications Alliance)
Joshua Seidemann (ITTA)
Steve Pastorkovich (OPASTCO)
Ross Lieberman (American Cable Association)
Glenn Reynolds (USTelecom Association)

During this meeting, these associations representing the nation's mid-size, small and rural providers of broadband services, urged the Commission to recognize the significant resources that will be necessary to implement some of the data collections proposals being considered in this proceeding. While each of the associations are supportive of efforts to improve the Commission's understanding of the extent of broadband deployment in this country and the hurdles to further deployment, it is critical that the Commission be cognizant that the ultimate goal is universal broadband deployment—not simply the collection of data. Any Commission mandate that requires the collection of data that will not clearly facilitate the Commission's goal of broadband deployment is likely to have the unintended effect of diverting these companies' limited resources that could be otherwise used to actually build out such networks in areas under-served.

The associations expressed specific concern with any data collection based upon 9-digit zip codes. It is not standard practice within these industry segments to identify customers based upon 9-digit zip code, so that implementation of such an approach would be extremely costly. Just as importantly, however, use of 9-digit zip codes would provide the Commission with little useful information because these are designed to facilitate efficient routing of bulk mail rather than having any geographic significance. Accordingly, the associations urged the Commission not to commit to collecting broadband data on this basis.

Pursuant to Commission rules, please include this notice in the docket of the proceeding identified above.

Sincerely,

A handwritten signature in black ink, appearing to read "Glenn Reynolds". The signature is written in a cursive style with a long horizontal flourish at the end.

Glenn Reynolds
Vice President, Policy

cc: Scott Bergmann

