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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:

Yesterday Eric Einhorn, Vice President - Federal Government Affairs, and I met with Scott Bergmann, Legal Advisor to Commissioner Jonathan Adelstein, to discuss the various broadband data collection proposals before the Commission in the above-referenced docket. Our discussion of the disadvantages of changing to a 9-digit ZIP code reporting method was consistent with the attached, which we presented to Mr. Bergmann. We stated Windstream's position that the Commission should enhance the current system of reporting at the 5-digit ZIP code level rather than move to 9-digit ZIP code-based reporting. We also explained that if the Commission desired to move from 5-digit ZIP codes to an alternative reporting system, census tracts are preferable to 9-digit ZIP codes for Form 477 reporting. We also strongly urged that the Commission limit any new reporting to *subscribership* data, since *availability* data reporting likely would impose significant burdens on carriers, including Windstream, and ultimately may produce less useful information than subscribership data.

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

Sincerely,

/s/

Jennie B. Chandra

cc (by e-mail): Scott Bergmann

Attachment

ANALYSIS OF POTENTIAL FORM 477 REPORTING UNITS

- **A number of parties have proposed a variety of different reporting units in the form 477 proceeding. There is substantial variation in the granularity of the data that would be reported under these various proposals:**

Geographic Unit	*Total # of Units in the U.S.*	*Average # of Households/Unit*
5-digit ZIP Code	~41,000[1]	~2,200 households/5-digit ZIP
Census Tract	~61,000	~1,300 households/Census Tract
9-digit ZIP Code	~30 million	~5-10 households/9-digit ZIP

Source: Claritas (referencing Tele Atlas data 15.0 release, 2000 U.S. Census data, current U.S. Postal Service data)

- **Requiring use of 9-digit ZIP codes would impose new costs without any significant new benefits.**

(1) Collecting, reporting, and analyzing data collected on a 9-digit ZIP code basis will be unwieldy for companies and government officials.

(2) Use of 9-digit ZIP codes may reveal individually identifiable customer information.

(3) 9-digit ZIP codes cannot be directly correlated with U.S. Census demographic information on age, gender, race, education, and income.

(4) 9-digit ZIP codes are not stable reporting units. The U.S. Postal Service updates its list of 9-digit ZIP codes each month.

(5) 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.

[1] Approximately 10,000 of these are point ZIPs or non-spatial ZIPs (e.g., P.O. boxes).