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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*** in 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:

On March 7, 2008, Jennie Chandra, Director - Federal Regulatory Affairs, and I met with Scott Deutchman, Legal Advisor to Commissioner Michael Copps, 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. Deutchman. 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. Also attached are excerpts from two U.S. Census Bureau webpages explaining the differences between ZIP code-based and Census-based information, as well as a comparison chart prepared by Windstream summarizing the elements of pending House and Senate legislation on broadband data reporting, which were also provided to Mr. Deutchman.

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

Sincerely,

/s/

Eric N. Einhorn

cc (by e-mail): Scott Deutchman

Attachments