



October 20, 2008

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Notice of *Ex Parte* Presentation; WC Docket No. 01-92

Dear Ms. Dortch:

On October 17, 2008 I met with Commissioner Adelstein and his legal adviser Scott Bergmann, by telephone, to discuss principles for guiding FCC reforms of the intercarrier compensation and universal service systems. Also participating on the call were NECA representatives Jim Frame, Regina McNeil and Joe Douglas.

Following are the key points discussed in the meeting:

- Proposals for reform as reported by the trade press have not been vetted – this raises many concerns regarding details. For example:
 - Rate levels – what and how
 - Operation of restructure mechanism funding
 - Impacts of capping high-cost funding for rate-of-return carriers
 - Role of NECA/Pooling
- Rural is different – this fundamental fact of life has not changed.
 - One uniform rate does not work
- The Commission must deal with court remand issues for ISP-bound traffic now and should seek comments on any new plan if not implementing existing proposals that have been vetted, such as the Missoula Plan.

Questions regarding this meeting may be directed to my attention or to Joe Douglas in NECA's Washington office, at 202-682-0153.

Sincerely,

A handwritten signature in black ink that reads "Randy Houdek".

Randy Houdek, General Manager

Cc:

Kevin J. Martin
Michael J. Copps
Jonathan S. Adelstein
Deborah Taylor Tate
Robert M. McDowell
Nicholas G. Alexander
Amy Bender
Scott Bergmann
Scott M. Deutchman
Ian Dillner
Greg Orlando
William Dever
Ann Stevens
Julie Veach
Pam Arluk
John Hunter
Albert Lewis
Deena Shetler
Lensworth Smith
Thomas Buckley
Cheryl Callahan
Jennifer McKee
Gina Spade
Ellen Burton
Alan Feldman
Jeremy Miller
Rodger Woock
Cathy Zima
Kirk S. Burgee
Marcus Maher
Jeremy Marcus
Dana R. Shaffer
Donald Stockdale
Julie Veach