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*NOT ADMITTED IN VA

June 12, 2009

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, DC 20554

Re: WC Docket No. 05-337
CC Docket No. 96-45

Madam Secretary:

In accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, we hereby provide you with notice of an oral ex parte presentation in connection with the above-captioned proceeding. On Thursday, June 11, 2009, undersigned counsel, on behalf of Rural Cellular Association ("RCA"), met with Nicholas Alexander in Commissioner McDowell's office.

At the meeting, we discussed the difficulty many carriers are experiencing in attempting to get clear information from the Universal Service Administrative Company ("USAC") about the implementation of the interim cap on high-cost support to competitive eligible telecommunications carriers. We reiterated the arguments made in RCA's comments and reply comments in response to the Corr Wireless Communications, LLC, Request for Review filed in the above-referenced dockets on March 11, 2009.

We also discussed the audits of high-cost universal service support recipients conducted by the Office of the Inspector General ("OIG"). Undersigned counsel explained that the OIG report released in November 2008 greatly overstated the number and size of improper payments, and that USAC ended up seeking recovery of only 0.13% of the amounts audited in the first round of audits. Undersigned counsel stressed the need for consideration of more-efficient alternatives to the "compliance attestation" audit approach being used to date.

Lastly, we discussed the common finding by auditors that carriers are not compliant with Section 54.201 of the Commission's rules if they do not list each supported service in their advertisements. Undersigned counsel emphasized that the services and functionalities listed in the FCC's rules together amount to what consumers understand as a single, integrated basic

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telephone service offering, and that consumers will not understand an advertisement that lists, for example, “dual-tone, multi-frequency signaling.”

A copy of the materials distributed at the meeting is attached. If you have any questions or require any additional information, please contact undersigned counsel directly.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven M. Chernoff". The signature is fluid and cursive, with a long horizontal stroke at the end.

David A. LaFuria
Steven M. Chernoff

Encl.

cc: Nicholas Alexander, Esq.