



**OPASTCO**

21 Dupont Circle NW  
Suite 700  
Washington, DC 20036

August 25, 2009

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

***Ex Parte Notice***

**Re: A National Broadband Plan for Our Future  
GN Docket No. 09-51**

**High-Cost Universal Service Support  
WC Docket No. 05-337**

**Federal-State Joint Board on Universal Service  
CC Docket No. 96-45**

**Developing a Unified Intercarrier Compensation Regime  
CC Docket No. 01-92**

**Review of the Commission's Program Access Rules and Examination of  
Programming Tying Arrangements  
MB Docket No. 07-198**

**Annual Assessment of the Status of Competition in the Market for the Delivery of  
Video Programming  
MB Docket No. 07-269**

Dear Ms. Dortch,

On August 25, 2009, John Rose, Stuart Polikoff, and Brian Ford of the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO) met with Julie Veach, Donald Stockdale, Kris Monteith, Rebekah Goodheart, Jennifer McKee, Lynne Engledow, and Marcus Maher from the Wireline Competition Bureau. The purpose of the meeting was to discuss OPASTCO's broadband goals for rural service areas and the regulatory reforms necessary for rural incumbent local exchange carriers (ILECs) to offer high-speed

broadband services to all of the consumers in their territories going forward. During the conversation we made the following points, all of which have been discussed in greater detail in OPASTCO's filings in the above-captioned proceedings:

- It is critical that consumers in rural service areas have access to broadband speeds and bandwidth capacity that can accommodate the growing number of bandwidth-intensive applications and services.
- The Commission should recognize that mobile wireless platforms are not a viable substitute for wireline technologies for providing high-quality, high-speed broadband throughout rural service areas.
- The Universal Service Fund should be reformed, including:
  - Adding broadband to the list of services supported by the High-Cost and Low Income programs;
  - Continuing to base support for rural ILECs on their actual embedded costs;
  - Removing the cap on the high-cost loop support mechanism;
  - Supporting rural ILECs' high middle-mile transport costs; and
  - Expanding the base of contributors to the USF to include all facilities-based broadband Internet access providers.
- The intercarrier compensation rules should be reformed, including the establishment of a replacement mechanism for rural ILECs' lost revenues from access charges.
- The Commission should ensure that rural ILECs receive equitable rates, terms, and conditions for middle-mile transport, Internet backbone access, and video programming.

In accordance with FCC rules, this letter is being filed electronically in the above-captioned dockets.

Sincerely,

Stuart Polikoff  
Director of Government Relations  
OPASTCO