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September 8, 2009

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
12th Street Lobby, TW-A325
Washington D.C. 20554

Re: Ex Parte Notification: WC Docket No. 05-337; CC Docket No. 80-286

Dear Ms. Dortch:

On September 3, 2009, Antoinette C. Bush and John M. Beahn of Skadden, Arps, Slate, Meagher & Flom LLP, on behalf of the Coalition for Equity in Switching Support (“Coalition”), and Cheryl L. Parrino of the Parrino Strategic Consulting Group, met with Christi Shewman, Commissioner Meredith Atwell Baker’s Acting Legal Advisor for wireline, universal service and consumer issues.

During this meeting, Ms. Parrino provided an overview of the Coalition’s efforts to have the Commission revise the local switching support (“LSS”) regulations adopted in the recent separations freeze extension *Report and Order*.¹ Ms. Bush and Mr. Beahn emphasized that any Notice of Proposed Rulemaking (“NPRM”) adopted to review these issues should tentatively conclude that modification of the LSS regulations is necessary to permit eligible carriers to receive support based on their actual number of access lines during any applicable reporting period. The Commission also should tentatively determine in the NPRM that the revised LSS regulations should apply to any annual period that has not closed prior to the effective date of the revised rules. Because the

¹ See Jurisdictional Separations and Referral to the Federal-State Joint Board, CC Docket No. 80-286, *Report and Order*, FCC 09-44 (rel. May 15, 2009)(“*Report and Order*”).

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Universal Service Administrative Company does not finally close its books on a calendar year until the end of the following calendar year, Ms. Bush discussed the need for the Commission to adopt quickly the NPRM with an expedited comment cycle to ensure that the revised LSS regulations are implemented no later than December 1, 2009. Prompt action by the Commission would provide Coalition members and other affected companies adequate time to prepare and file the necessary line count information for 2008.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed electronically with your office. Should you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ John M. Beahn

John M. Beahn