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Filed Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
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RE: GN Docket Nos. 09-51 and 09-137

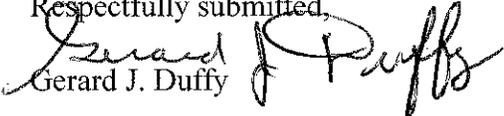
Dear Ms. Dortch:

On September 29, 2009, Derrick Owens, Bob DeBroux and Gerry Duffy representing the Western Telecommunications Alliance ("WTA") met with Christine Kurth, Policy Director & Wireline Counsel to Commissioner Robert M. McDowell, to discuss various broadband matters.

The topics included: (a) the success of WTA's rural telephone company members in deploying digital subscriber line ("DSL") and hybrid fiber-DSL facilities to provide broadband services to increasing portions of their rural customers; (b) the advantages (particularly, capacity and scalability) of fiber optic facilities in bringing existing and future broadband services efficiently to rural areas; (c) the flexibility and economic viability of deploying broadband in an incremental manner similar to the Interstate Highway System model; (d) the need for sufficient and continuing high-cost Universal Service Fund support to enable rural telephone companies to upgrade, operate and maintain their networks as broadband services evolve; (e) the advantages of complementary wireline and wireless broadband networks in rural America; and (f) the ability of rural telephone companies to deploy broadband incrementally in neighboring unserved and underserved rural areas if certain regulatory constraints (e.g., lengthy study area waiver processing periods and the Section 54.305 "parent trap" rule) are eliminated.

Pursuant to Section 1.1206(b) of the Commission's Rules, this submission is being filed for inclusion in the public record of the referenced proceedings.

Respectfully submitted,


Gerard J. Duffy

cc: Christine Kurth