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November 5, 2009

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Federal-State Joint Board on Universal Service, CC Docket No. 96-45; High-Cost
Universal Service Support, WC Docket No. 05-337

Dear Ms. Dortch:

Today Eric Einhorn and I, both with Windstream, met with Irene Flannery, Katie King, Jennifer McKee, and Alex Minard, all of the FCC's Wireline Competition Bureau, regarding the FCC's response to the 10th Circuit remand.¹ We discussed Windstream's comments in response to the FCC's Notice of Inquiry in this proceeding,² and requested that the FCC's upcoming Notice of Proposed Rulemaking reflect these comments by seeking input on how to better target federal universal service support directly to granular high-cost areas. Specifically we recommended that the Notice of Proposed Rulemaking solicit comment on reforms that would place price cap companies under the forward-looking mechanism and modify the mechanism to eliminate eligibility requirements based on statewide average costs.

Please feel free to contact me if you require additional information.

Sincerely,

/s/

Jennie Chandra

cc: Irene Flannery
Katie King
Jennifer McKee
Alex Minard

¹ *Qwest Communications Int'l, Inc. v. FCC*, 398 F.3d 1222 (10th Cir. 2005).

² Comments of Windstream Communications, Inc., WC Docket No. 05-337, CC Docket No. 96-45 (filed May 8, 2009).