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November 30, 2009

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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, spoke via teleconference with Priya Aiyar, Legal Advisor to Chairman Julius Genachowski, regarding the FCC's response to the 10<sup>th</sup> Circuit remand.<sup>1</sup> We discussed Windstream's comments in response to the FCC's Notice of Inquiry in this proceeding,<sup>2</sup> 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 (i.e., eliminate the rural/non-rural distinction for price cap carriers) 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 B. Chandra

cc: Priya Aiyar

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<sup>1</sup> *Qwest Communications Int'l, inc. v. FCC*, 398 F.3d 1222 (10<sup>th</sup> Cir. 2005).

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