



**INDEPENDENT TELEPHONE & TELECOMMUNICATIONS ALLIANCE**

December 8, 2009

Marlene H. Dortch  
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*  
*Implementation of Section 224 of the Act: Amendment of the*  
*Commission's Rules and Policies Governing Pole Attachments*  
*WC Docket No. 07-245, RM-11293***

Dear Ms. Dortch:

Today, Curt Stamp and I met with Jennifer Schneider of Commissioner Michael Copps's office to discuss the 10<sup>th</sup> Circuit remand of non-rural Universal Service Fund (USF) mechanisms, and pole attachments.

Consistent with prior filings of ITTA in the USF dockets, ITTA urged the Commission to ensure that the impending *Notice of Proposed Rulemaking* include a discussion of, and seek comment on, the distribution of support for price cap carriers on a wire center, rather than statewide averaged, basis. ITTA explained that wire center targeting will better ensure that funding reach the areas where support is most needed, and described how targeting addresses the mandates of 47 U.S.C. § 254(b) by promoting access to services in high-cost areas in a specific, sufficient, and predictable manner.

ITTA also discussed the need for the Commission to ensure that incumbent local exchange carriers (ILECs) are entitled to just and reasonable rates, terms, and conditions for their pole attachments, pursuant to 47 U.S.C. § 224(a)(4). ITTA explained that in many rural areas served by ITTA members, aerial cable is a more efficient means of deployment than trenching for underground fiber, and that ITTA members are frequently subject to onerous conditions imposed by pole owners.

The attached map of ITTA service areas was provided to Ms. Schneider.

Please do not hesitate to contact me if you have any questions or require additional information.

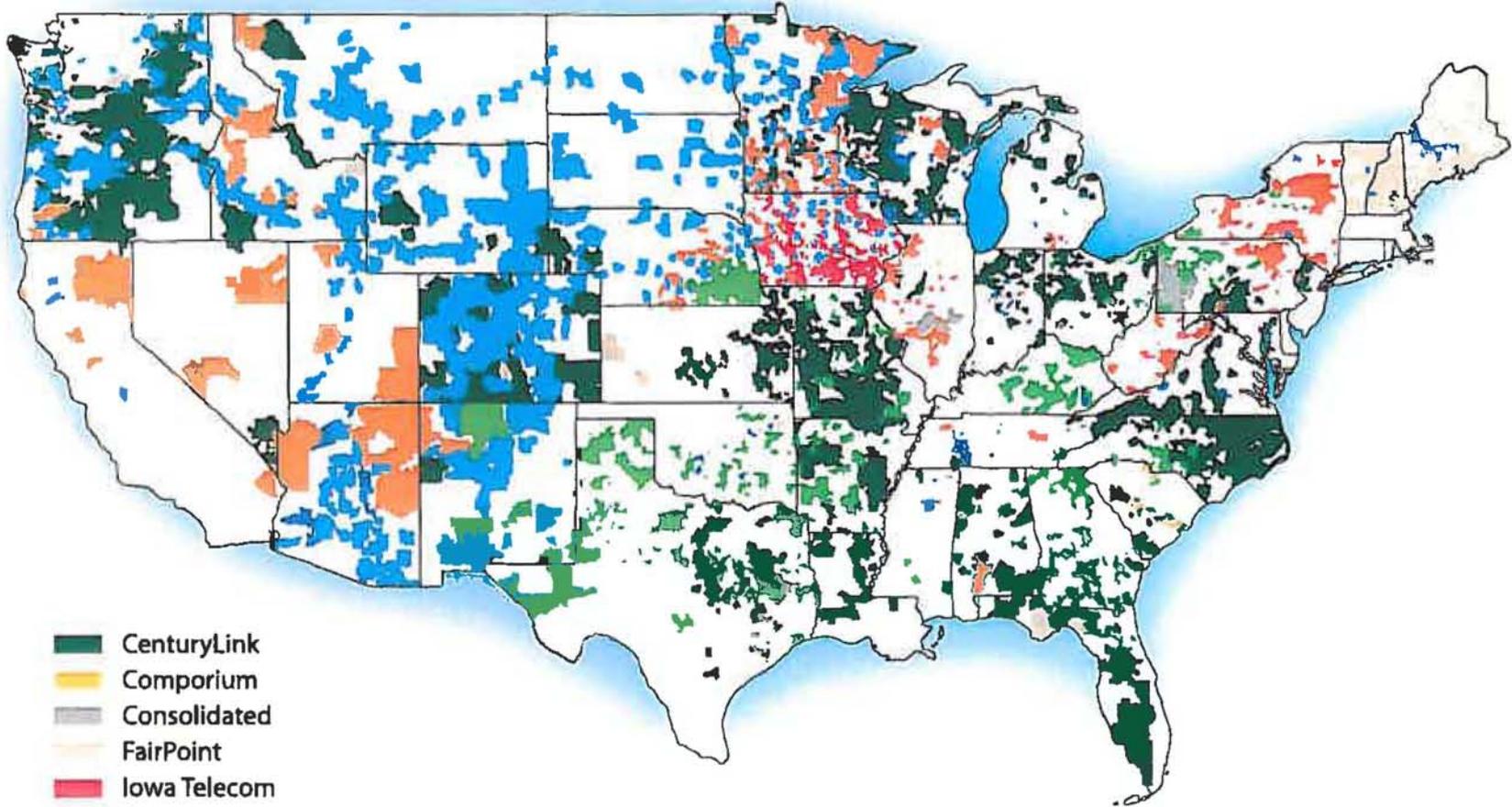
Respectfully submitted,

Joshua Seidemann  
Vice President, Regulatory Affairs

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cc: Jennifer Schneider



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