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December 14, 2009

VIA ECFS

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

**Re: *Notice of Ex Parte Communication,*
WC Docket No. 05-337, CC Docket No. 96-45**

Dear Ms. Dortch:

Yesterday, Holly Henderson of SouthernLINC Wireless, Tim Donovan of the Rural Cellular Association, Isaac Himowitz of Kelley Drye & Warren, and I met with Paul de Sa, Chief of the Office of Strategic Planning & Policy Analysis, on behalf of the Universal Service for America Coalition.¹ Mr. Himowitz and I were able to attend the meeting in person, while Ms. Henderson and Mr. Donovan joined us via telephone. During the meeting, we discussed various issues relating to universal service, including:

- the relationship between broadband deployment and universal service reform;
- the relationship between universal service reform and special access reform, including the detrimental impact that subsidizing only one or two service providers in rural markets could have on the availability of “second-mile” and “middle-mile” connectivity at reasonable rates, terms and conditions in those areas;

¹ The USA Coalition consists of four of the nation’s leading rural providers of wireless services, and is dedicated to advancing regulatory policies that will enable Americans to enjoy the full promise and potential of wireless communications, regardless of where they live and work. The members of the USA Coalition include Carolina West Wireless, Mobi PCS, SouthernLINC Wireless, and Thumb Cellular LLC.

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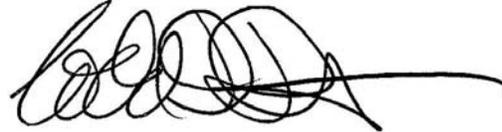
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- the appropriate perspective for considering long-term universal service reform, and the importance of ensuring that any reform is technologically and competitively neutral;
- the benefits to consumers and the Commission of relying on market forces and the threat of entry to discipline providers of service in rural, insular and high-cost areas rather than the extensive regulation that would be necessary if the Commission limited USF funding to one or two providers in such areas; and
- the potential harms of establishing arbitrary requirements for USF support with respect to speed or type of service – such requirements would only inhibit the deployment of broadband and voice services in rural areas.

During our discussion, we also provided copies of the attached letter to Chairman Genachowski.

Pursuant to Section 1.1206(b) of the Commission's rules, a copy of this letter is being filed via ECFS with your office. Please contact the undersigned if you have any questions or need additional information.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Todd D. Daubert', with a long horizontal flourish extending to the right.

Todd D. Daubert
Counsel for the USA Coalition

cc: Paul de Sa, Chief of the Office of Strategic Planning & Policy Analysis