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VIA ELECTRONIC FILING

Ms. Marlene Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street SW
Washington DC 20554

Re: NOTICE OF EX-PARTE COMMUNICATIONS

In the Matter of High-Cost Universal Service Support, WC Docket No. 05-337
In the Matter of Universal Service Contribution Methodology, WC Docket No. 06-122
In the Matter of Federal-State Joint Board on Universal Service, CC Docket No. 96-45

Dear Ms. Dortch:

Yesterday, Mary Henze, Cathy Carpino and I (all of AT&T Inc.), met with Jennifer McKee, Amy Bender, Ted Burmeister, Nick Degani, Claudia Fox (via telephone), Alex Minard, and Vickie Robinson of the Wireline Competition Bureau. The purpose of the meeting was to discuss the Commission's Public Notice requesting comment on two Universal Service Administrative Company ("USAC") letters seeking policy guidance on various universal service issues.¹

During our meeting, we informed staff that, beginning on January 1, 2010, AT&T will begin reporting *its* revenue derived from selling prepaid calling card customers to its wholesale customers in its assessable base (unless, of course, AT&T has a valid reseller certification from the reseller, in which case it will continue to report such revenue as carrier's carrier revenue). Thus, AT&T will cease contributing on the basis of its non-contributing resellers' revenues. As we have explained in previously filed comments,² AT&T's unilateral decision to begin contributing on this basis, which it began in the fourth quarter of 2006, has placed it at a significant competitive disadvantage. The unexpectedly prolonged Commission inaction on AT&T's October 10, 2006 appeal of USAC's prepaid calling card findings³ has exacerbated this situation. AT&T again requested that the

¹ Comment Sought on Request for Universal Service Fund Policy Guidance Requested by the Universal Service Administrative Company, WC Docket Nos. 05-337, 06-122, CC Docket No. 96-45, Public Notice, DA 09-2117 (rel. Sept. 28, 2009).

² See AT&T Comments filed October 28, 2009 and AT&T Reply Comments filed Nov. 12, 2009 in WC Docket Nos. 05-337, 06-122, CC Docket No. 96-45.

³ Request for Review by AT&T Inc. of Decision of Universal Service Administrator, CC Docket No. 96-45 (filed Oct. 10, 2006).

Bureau or Commission act quickly on AT&T's three year old appeal and USAC's four year old request for guidance so that all prepaid calling card providers soon will be contributing to the universal service fund on the same basis. The remainder of the discussion was consistent with AT&T's publicly filed comments and no materials were used during the meeting.

Consistent with section 1.1206 of the Commission's rules, the attached is being filed in each of the above referenced dockets via the FCC's Electronic Comment Filing System. Should you have any questions regarding the attached, please feel free to contact me directly via the means most convenient to you.

Sincerely,

A handwritten signature in black ink, appearing to read "J. McKee". The signature is stylized with a large, looped initial "J" and a long, horizontal flourish extending to the right.

Cc: Jennifer McKee
Amy Bender
Ted Burmeister
Nick Degani
Alex Minard
Vickie Robinson
Claudia Fox