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January 13, 2010

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

Re: *Requirements in the Broadband Data Improvement Act, GN Docket No. 09-47; A National Broadband Plan for Our Future, GN Docket No. 09-51; International Comparison and Consumer Survey Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, and Possible Steps to Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act of 1996, as Amended by the Broadband Data Improvement Act, GN Docket No. 09-137*

Dear Ms. Dortch:

Yesterday Eric Einhorn and I, representing Windstream Communications, Inc. (“Windstream”), met with Tom Koutsky, Paul de Sa, Al Lewis, Rohit Dixon, B.J. Neal, Elvis Stumbergs, and Kevin King of the Federal Communications Commission. Cesar Caballero, Frank Schueneman, and Bill Kreutz, also of Windstream, joined the discussion via telephone.

In this meeting, Windstream explained that second mile, rather than middle mile, costs are the primary impediment to deploying broadband to the vast majority of Windstream’s unserved households. Windstream now has deployed middle mile fiber facilities to approximately 95 percent of its central offices (1,073 of 1,124 central offices), and broadband is available to 97 percent of its central offices (1,091 of 1,124 central offices).¹

Windstream stated that federal funds will have the greatest impact on broadband availability if they are focused on deployment of second mile facilities in unserved areas. Any additional subsidies for middle mile costs should be conditioned on a convincing showing that transport has prevented all broadband deployment in a specified *unserved* area. All such recommendations conveyed were consistent with Windstream’s comments filed in

¹ Fiber connectivity is not strictly required to enable broadband access in every exchange.

response to *NBP Public Notice #11 – Comment Sought on Impact of Middle and Second Mile Access on Broadband Availability and Deployment.*

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

Sincerely,

/s/

Jennie B. Chandra

cc: Tom Koutsky
Rohit Dixon
Kevin King

Paul de Sa
B.J. Neal

Al Lewis
Elvis Stumbergs