



Gary L. Phillips
General Attorney &
Associate General Counsel

AT&T Services, Inc.
1120 20th St. NW, Suite 1000
Washington, D.C. 20036
Phone 202 457-3055
Fax 202 457-3074

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

Re: A National Broadband Plan for Our Future, GN Docket No. 09-51; International Comparison and Consumer Survey Requirements in the Broadband Data Improvement Act, GN Docket No. 09-47; Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, GN Docket No. 09-137; High-Cost Universal Service Support, WC Docket No. 05-337; Lifeline and Link-Up, WC Docket No. 03-109

Dear Ms. Dortch:

In the past month, AT&T has met several times with Commission staff to discuss the Commission's authority to refocus its existing universal service programs to support broadband infrastructure and services. In those meetings we explained how the Commission could accomplish this goal by relying on its existing authority in section 254 and Title I of the Communications Act of 1934, as amended. The attached white paper details our analysis.

Sincerely,

/s/ Gary L. Phillips

cc: Austin Schlick
Sonja Rifken
Chris Killion
Diane Holland
Julie Veach
Sharon Gillett
Irene Flannery
Jennifer McKee
Vickie Robinson
Amy Bender
Randy Clarke
Carol Matthey