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**Filed Via ECFS**

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

**RE: GN Docket Nos. 09-47, 09-51 and 09-137**

Dear Ms. Dortch:

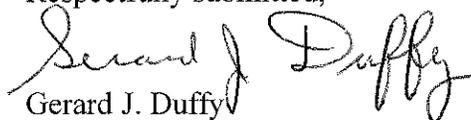
On February 2, 2010, Robert DeBroux, Derrick Owens, Eric Keber and Gerard Duffy representing the Western Telecommunications Alliance ("WTA") met with Christi Shewman, Acting Legal Advisor for Wireline and Universal Service, to Commissioner Meredith Attwell Baker, to discuss various broadband matters.

The topics included: (a) the success of WTA members and other rural local exchange carriers ("RLECs") in extending the current version of "broadband" service to approximately 90 percent of their rural customers; (b) the substantial additional future investments necessary for RLECs to extend "broadband" to some or all of their remaining rural customers as well as to increase "broadband" speeds and capacities to the higher and higher levels that will be needed during coming years; (c) the critical importance of Universal Service Fund ("USF") support and Intercarrier Compensation revenues to both the past and future ability of RLECs to extend, upgrade and operate their broadband-capable networks; (d) the manner in which Carrier of Last Resort ("COLR") obligations and associated reporting obligations impose substantial additional costs upon RLECs; (e) the presence of unaffiliated cable television broadband and/or voice services in only a very small portion of the towns and villages (and in none of the unincorporated outlying rural areas) in the study areas of WTA members; (f) the possibility that the overall size of the USF would increase if high-cost support was limited to outlying rural areas; (g) the complexities of estimating risk and of calculating a revised "rate of return" for RLECs; (h) the complementary nature of wireline and wireless "broadband" services; (i) the stability of USF support for RLECs during the past five years and the actual factors predominately responsible for recent increases in the USF contribution factor; (j) the potential use of connections or number-based mechanisms to address USF contribution factor problems; and (k) the increased difficulties encountered by RLECs in collecting access charges or reciprocal compensation from some service providers terminating traffic on RLEC networks.

Marlene H. Dortch, Secretary  
February 2, 2010  
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Pursuant to Section 1.1206(b) of the Commission's Rules, this submission is being filed for inclusion in the public record of the referenced proceedings.

Respectfully submitted,

  
Gerard J. Duffy

cc: Christi Shewman