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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 Sharon Gillett, Donald Stockdale, Alexander Minard, Katie King and Amy Bender of the Wireline Competition Bureau and Carol Matthey of the Office of Strategic Planning and Policy Analysis, 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 (approximately 30-to-40 percent of regulated revenues) and Intercarrier Compensation revenues (another approximate 30-to-40 percent of regulated revenues) to both the past and future ability of RLECs to extend, upgrade and operate their broadband-capable networks; (d) 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; (e) the possibility that the overall size of the USF would increase if high-cost support was limited to outlying rural areas; (f) the complexities of estimating risk and of calculating a revised “rate of return” for RLECs; (g) the complementary nature of wireline and wireless “broadband” services; (h) 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; and (i) the potential use of connections or number-based mechanisms to address USF contribution factor problems.

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: Sharon Gillett
Donald Stockdale
Alexander Minard
Katie King
Amy Bender
Carol Matthey