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February 18, 2010

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
12th Street Lobby, TW-A325
Washington D.C. 20554

Re: Ex Parte Notification: WC Docket No. 05-337

Dear Ms. Dortch:

On February 17, 2010, on behalf of the Coalition for Equity in Switching Support (“Coalition”), Antoinette C. Bush and John M. Beahn of Skadden, Arps, Slate, Meagher & Flom LLP and Cheryl L. Parrino of the Parrino Strategic Consulting Group met with Jennifer McKee, Amy Bender, Ted Burmeister and Alex Minard of the Wireline Competition Bureau and Christopher Killion of the Office of General Counsel. Ms. Parrino also participated in a subsequent telephone conversation with Ms. McKee.

During the meeting, Ms. Parrino maintained that expeditious adoption of the revised local switching support (“LSS”) regulations would permit affected carriers to undertake critical network upgrades and employee retention and hiring efforts as soon as possible. In adopting the revised regulations, the Commission should recognize that the rules require carriers to file certain data, including DEM weighting factors, by October in order to receive LSS assistance during the next calendar year. In light of the fact that affected small carriers could not reasonably be expected to have filed the required forms in October 2009 based on the proposed revisions to the LSS regulations, Ms. Parrino asserted that good cause exists to: 1) make the revised LSS regulations effective upon release; 2) waive the October 2009 filing deadline, require affected carriers to file the necessary forms (or updates to previously filed forms) within 15 days of the date of the order, and direct USAC to make LSS payments in 2010 based on the newly filed forms; and 3) waive enforcement of the existing LSS

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regulations as of January 1, 2010 so that affected carriers may receive appropriate LSS assistance payments for the full calendar year of 2010 during 2010. Finally, Ms. Parrino indicated that if the revised LSS rules do not become effective upon release of the order, the Coalition urges the Commission to make them effective upon publication in the Federal Register.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed electronically with your office. Should you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Antoinette C. Bush

Antoinette C. Bush

*Counsel to the Coalition for Equity in Switching
Support*

cc: Jennifer McKee
Amy Bender
Ted Burmeister
Alex Minard
Christopher Killion
Edward Lazarus
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