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June 30, 2010

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**Filed Via ECFS**

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

**RE: GN Docket No. 09-51 and WC Docket Nos. 10-90 and 05-337**

Dear Ms. Dortch:

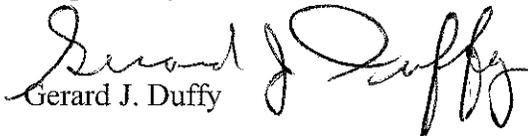
On June 30, 2010, Paul Kelly of Cordova Telephone Cooperative, Inc.; Steve Merriam of Arctic Slope Telephone Association Cooperative; Doug Neal of OTZ Telephone Cooperative, Inc.; and Derrick Owens and Gerard Duffy representing the Western Telecommunications Alliance met with Commissioner Robert M. McDowell; Rosemary Harold, Legal Advisor to Commissioner McDowell; and Timothy Kennedy, Rachel Costello, Brooke Ericson and Jameson Dempsey of Commissioner McDowell's staff, to discuss various broadband and universal service matters affecting Alaskan rural telephone companies and their customers.

The topics included: (a) the unique nature of Alaskan telecommunications operating conditions and costs; (b) the success of Alaskan rural telephone companies in deploying digital subscriber line ("DSL") services in their large and remote service areas; (c) the manner in which Rate of Return regulation has enabled Alaskan rural telephone companies to obtain critical financing and to construct, upgrade, operate and maintain their networks in an efficient and effective manner; (d) the inability of potential cost models to depict accurately the reasonable costs of constructing, operating and maintaining Alaskan telecommunications networks; (e) the very high costs of middle mile transport and the constraints it places upon the broadband speeds and services available to Alaskan customers; and (f) the manner in which concerns regarding the future universal service and intercarrier compensation revenue streams of rural telephone companies has been drying up infrastructure financing and even discouraging some rural telephone companies from accepting the grant/loans awarded to them by the Broadband Initiatives Program of the Rural Utilities Service.

Marlene H. Dortch, Secretary  
June 30, 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: Commissioner Robert M. McDowell  
Rosemary Harold