

CAHILL GORDON & REINDEL LLP

SUITE 950

1990 K STREET, N.W.

WASHINGTON, D.C. 20006-1181

EIGHTY PINE STREET
NEW YORK, N.Y. 10005-1702
(212) 701-3000
FAX: (212) 269-5420

TELEPHONE (202) 862-8900
FACSIMILE (866) 255-0185

AUGUSTINE HOUSE
6A AUSTIN FRIARS
LONDON, ENGLAND EC2N 2HA
(011) 44.20.7920.9800
FAX: (011) 44.20.7920.9825

CHÉRIE R. KISER | 202-862-8950 | ckiser@cgrdc.com

August 12, 2010

VIA ECFS

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

Re: Notice of Ex Parte Presentation - WC Docket No. 05-337, WC Docket No. 06-122, CC Docket No. 96-45

Dear Secretary Dortch:

On August 11, 2010, the undersigned, on behalf of STi Prepaid, LLC (“STi”), met with Claudia Fox, Lisa Gelb, Rebekah Goodheart, Carol Pomponio, and Vickie S. Robinson of the Wireline Competition Bureau to discuss matters pertinent to the universal service contribution methodology and contributor base.

STi reiterated the points made in its prior submissions in the above-referenced proceedings that any changes made to the methodology and/or contributor base should: (1) ensure the Universal Service Fund is administered in a competitively neutral manner; (2) correct, not perpetuate, the current inequitable and discriminatory revenue reporting requirements for telecommunications carriers providing prepaid services; and (3) include increased enforcement measures to ensure that all service providers who are required to contribute to the Universal Service Fund are contributing. Finally, STi suggested that before the Federal Communications Commission increases the size of the Universal Service Fund, it should review the existing beneficiary structure against the needs of the present day marketplace to ensure the funds are appropriately directed.

Please contact the undersigned if you have any questions regarding this matter.

Respectfully submitted,


Cherie R. Kiser

cc: Claudia Fox
Lisa Gelb
Rebekah Goodheart
Carol Pomponio
Vickie S. Robinson