



VIA ELECTRONIC DELIVERY

August 30, 2010

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

Re: Ex Parte Communication, CC Docket 96-45, CC Docket No. 01-92, WC Docket 05-337, WC Docket No. 06-122, GN Docket No. 09-51, WC Docket No. 10-90, GN Docket No. 10-127

Dear Ms. Dortch:

On August 27, 2010, David Bergmann, Chair of the National Association of State Utility Consumer Advocates (“NASUCA”) Telecommunications Committee, with the Office of the Ohio Consumers’ Counsel, had a telephone conversation with staff of the Federal Communications Commission Wireline Competition Bureau, including Carol Matthey (Deputy Bureau Chief), Katie King (Telecommunications Access Policy Division), and Patrick Halley (Legal Advisor). During the conversation, a number of universal service issues were discussed, including whether there is continuing need for support for the traditional voice services for rural and non-rural carriers; the need for a rate census for rural carriers; and whether there are amounts in the high-cost fund that are not necessary to ensure that rural rates are affordable and are reasonably comparable to urban rates. The logical disconnect between the carriers’ pleas for replacement revenues and their push for rate deregulation was discussed.

Mr. Bergmann also indicated that the subjects discussed were also pertinent to support for broadband service. This includes the need to ensure that the rates for broadband services (and the services themselves) in rural areas are reasonably comparable to those in urban areas.

Finally, the universal service contribution mechanism was discussed. Mr. Bergmann stressed NASUCA's consistent opposition to a numbers- or connections-based mechanism, and the likelihood that any such mechanism would be just as complex, and would be met with just as many requests for exemption or special treatment, as the current revenue-based mechanism.

All discussion was consistent with NASUCA many filings over the years in the above-listed dockets.

Respectfully submitted,

/s/ David C. Bergmann

David C. Bergmann
Assistant Consumers' Counsel
Chair, NASUCA Telecommunications Committee
bergmann@occ.state.oh.us
Office of the Ohio Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, OH 43215-3485
Phone (614) 466-8574
Fax (614) 466-9475

NASUCA
8380 Colesville Road (Suite 101)
Silver Spring, MD 20910
Phone (301) 589-6313
Fax (301) 589-6380

CC: Carol Matthey, Katie King, Patrick Halley