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EX PARTE

Electronic Filing via ECFS

September 9, 2010

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

Re: *In the Matter of Federal-State Joint Board on Universal Service, High Cost Universal Service Support, WC Docket No. 05-337*

In the Matter of Federal-State Joint Board on Universal Service, CC Docket No. 96-45

In the Matter of Universal Service Contribution Methodology, WC Docket No. 06-122

In the Matter of Framework for Broadband Internet Service, GN Docket No. 10-127

Dear Ms. Dortch:

On September 8, 2010, Melissa Newman (in person) and Peter Copeland, Tiffany Smink, Deb Haar and Shelly Eggert (by phone), all of Qwest, met with Vickie Robinson, Leon Jackler and Chin Yoo (in person) and Claudia Fox, Carol Pomponio and Erica Myers (by phone) to discuss the above-captioned proceeding.

We met to discuss reform of the universal service contribution methodology. We discussed the problems with the current methodology. Qwest proposed that the universe of contributors to the fund should be expanded to include all providers of interstate telecommunications and that contributing services should include all services enabling interstate telecommunications. Qwest proposed that if the Commission continues to use a revenue-based contribution approach, the Commission should consider developing one or more safe harbors that could be used to allocate interstate and intrastate revenues for services or packages of services that enable both interstate and intrastate communications. Qwest proposed that the Commission consider ways to encourage States to implement complementary state contribution mechanisms as the easiest

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way to ensure that state mechanisms do not burden the federal contribution mechanism. Qwest emphasized that the current methodology and reporting forms must be simplified and that fewer buckets and similar contribution treatment across buckets will also help to keep contribution requirements competitively neutral.

This *ex parte* is being filed electronically pursuant to 47 C.F.R. §§ 1.49(f) and 1.1206(b). Please contact me at 202.429.3120 if you have any questions.

Sincerely,

/s/ Melissa E. Newman

Copy via email to:
Claudia Fox
Leon Jackler
Erica Myers
Carol Pomponio
Vickie Robinson
Chin Yoo