



CenturyLink™

Jeffrey S Lanning
Director- Federal Regulatory Affairs
701 Pennsylvania Ave., NW
Suite 820
Washington, DC 20004

Voice: (202) 393-7113
Fax: (913) 397-3649
jeffrey.s.lanning@centurylink.com

September 10, 2010

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

EX PARTE NOTICE

Re: Universal Service Contribution Methodology, WC Docket No. 06-122.

Dear Ms. Dortch:

On behalf of CenturyLink, David Bartlett, John Benedict and I met with Vickie Robinson, Claudia Fox (by telephone), Erica Myers, Carol Pomponio, and Chin Yoo of the Telecommunications Access Policy Division of the Wireline Competition Bureau on September 9, 2010. We discussed issues associated with reforming the system for collecting contributions to the Universal Service Fund (USF).

Specifically, CenturyLink explained its view that the current methodology for USF contributions is unstable, eroding, and susceptible to arbitrage. CenturyLink submitted, therefore, that the USF contribution methodology must be reformed promptly, and it noted that there is little disagreement in the record on this point. CenturyLink also suggested that contributions should be received from as broad a base as possible as the purposes of the USF are to serve social policy goals that benefit all Americans, and all telecommunications users specifically. In this regard, CenturyLink does not oppose a modest increase in the size of the USF.

CenturyLink also explained that it has supported and continues to support reform proposals based on numbers and/or connections. At the same time, CenturyLink could also support reform proposals based on revenues. In either case, CenturyLink argued that the critical factor is that USF contributions must be implemented in a competitively neutral and administratively simple manner.

Pursuant to Section 1.1206(b) of the Commission's rules, one copy of this electronic notice is being filed in each of the above-referenced dockets. Please contact me if you have any questions or need anything else.

Sincerely,

Jeffrey S Lanning

cc: Vickie Robinson, Claudia Fox, Erica Myers, Carol Pomponio, and Chin Yoo