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December 2, 2010

Ex Parte

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

Re: Request for Review by Corr Wireless Communications, LLC, of Decision of Universal Service Administrator, CC Docket No. 96-45, WC Docket No. 05-337

Dear Ms. Dortch:

Yesterday, John Scott of Verizon Wireless and I met with Carol Matthey, Trent Harkrader, Amy Bender, Vickie Robinson, Elise Kohn, and Patrick Halley of the Wireline Competition Bureau. We discussed the request for “clarification” and “modification” sent by David LaFuria to the Universal Service Administrative Company (USAC) regarding the line count methodology used to determine high cost support due to Verizon Wireless.¹

We explained that, following the FCC’s approval of Verizon Wireless’s acquisition of Alltel Corporation and Rural Cellular Corporation (RCC) and the subsequent integration of those companies into Verizon Wireless, it was entirely appropriate for Verizon Wireless to include in its Form 525 line count filing all lines it served under common ownership or control within the areas in which its subsidiary companies were designated as competitive eligible telecommunications carriers (CETCs).² Indeed, unless and until these companies relinquished their CETC designations, in whole or in part, Verizon Wireless was obligated to report those lines, just as it was obligated to continue to fulfill its CETC commitments throughout the designated areas. This understanding is consistent with guidance that Verizon Wireless received from FCC staff in 2009 and is reflected in a September 30, 2009 letter from Verizon Wireless to USAC, a copy of which was provided to the Commission at that time.³

¹ Letter from David A. LaFuria and Robert S. Koppel to Karen Majcher, Vice President, High Cost & Low Income Division, USAC (Oct. 29, 2010)(“*October 29 Letter to USAC*”).

² See 47 C.F.R. §§ 54.307(b), 54.802(a).

³ Letter from Tamara Preiss, Verizon Wireless, to Karen Majcher, Vice President, High Cost & Low Income Division, USAC (Sept. 30, 2009). A copy of the letter is attached to this filing. A similar letter, filed March 30, 2010, is also attached. See Letter from Rohan Ranaraja, Verizon Wireless, to Karen Majcher, Vice President, High Cost & Low Income Division, USAC (March 30, 2010).

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We further explained that the Commission's *Corr Order* reflects the same understanding.⁴ That order states that high cost support due to Verizon Wireless may be calculated "each quarter based on *current data for that quarter*."⁵ It nowhere states that Verizon Wireless should subtract from its reported line counts the number of Verizon Wireless subscribers as of December 2008, as Mr. LaFuria requests.⁶ In short, Mr. LaFuria's proposed "modifications" find no support in the *Corr Order* or any other Commission precedent and must be rejected.

This letter is being filed electronically pursuant to Section 1.1206 of the Commission's Rules. Please contact me if you have any questions.

Sincerely,



Attachments

cc: Carol Matthey
Trent Harkrader
Amy Bender
Vickie Robinson
Elise Kohn
Patrick Halley

⁴ *High-Cost Universal Service Support; Federal-State Joint Board on Universal Service; Request for Review of Decision of Universal Service Administrator by Corr Wireless Communications, LLC*, WC Docket No. 05-337, CC Docket No. 96-45, Order and Notice of Proposed Rulemaking, 25 FCC Rcd 12854 (2010) ("*Corr Order*").

⁵ *Id.*, ¶ 17 (emphasis added).

⁶ See *October 29 Letter to USAC* at 4.

ATTACHMENT 1



Verizon Wireless
1300 I Street, N.W.
Suite 400 West
Washington, DC 20005

Phone 202 589-3740
Fax 202 589-3750

September 30, 2009

VIA E-MAIL AND U.S. MAIL

Karen Majcher
Vice President, High Cost & Low Income Division
Universal Service Administrative Company
2000 L Street, NW, Suite 200
Washington, DC 20036

RE: September 30, 2009 Form 525 Filings for RCC and Alltel entities

Dear Ms. Majcher:

With the acquisition of Rural Cellular Corporation (RCC) and Alltel and its affiliates, and the ongoing integration of those entities (other than the divestiture properties) into Verizon Wireless, we wish to confirm that we have included all lines under common ownership or control in the RCC and Alltel designated areas in our September 30, 2009 Form 525 Line Count Filings. This is consistent with guidance from FCC staff.

The integration efforts should be complete by the end of 2009. The integrated operations are reflected in the IAS portion of the September 30, 2009 filing for Alltel Study Area Codes 199001 (Virginia) and 199006 (Virginia); the IAS portion of the September 30, 2009 filing for RCC Study Area Codes 259001 (Alabama) and 529002 (Mississippi); and the IAS, HCL, ICLS, and HCM portions for the RCC Study Area Codes 369004 (Minnesota) and 399003 (South Dakota).

Please do not hesitate to call at (202) 589-3770 should you have any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read "Tamara L. Preiss".

Tamara L. Preiss

cc: Jennifer McKee (via e-mail)

ATTACHMENT 2



March 30, 2010

VIA E-MAIL AND U.S. MAIL

Karen Majcher
Vice President, High Cost & Low Income Division
Universal Service Administrative Company
2000 L Street, NW, Suite 200
Washington, DC 20036

RE: March 30, 2010 Form 525 Filings for RCC and Alltel entities

Dear Ms. Majcher:

With the acquisition of Rural Cellular Corporation (RCC) and Alltel and its affiliates, and the ongoing integration of those entities (other than the divestiture properties) into Verizon Wireless, we wish to confirm that we have included all lines under common ownership or control in the RCC and Alltel designated areas in our March 30, 2010 Form 525 line count filings. This is consistent with guidance from FCC staff.

The billing system integration efforts were completed in October of 2009. The integrated operations are reflected in the IAS portion of the March 30, 2010 filing for all the former Alltel Study Area Codes and all the former RCC Study Area Codes; the HCL, ICLS, and HCM portions of the March 30, 2010 filing for all the former RCC and Alltel Study Area Codes except for the following: 469003 (Colorado), 359010 (Iowa), 419905 (Kansas), 319010 (Michigan), 369001 and 369002 (Minnesota), 379013 (Nebraska), 559001 (Nevada), 339016, 339016 and 339017 (Wisconsin) and 209008 (West Virginia).

Please do not hesitate to call me at (501) 905-6037 or Tamara Preiss at (202) 515-2540 should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Rohan Ranaraja".

Rohan Ranaraja