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December 23, 2010

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Developing a Unified Intercarrier Compensation Regime,
CC Docket No. 01-92
Establishing Just and Reasonable Rates for Local Exchange Carriers,
WC Docket No. 07-135
High-Cost Universal Service Support, WC Docket No. 05-337
Connect America Fund, WC Docket No. 10-90
A National Broadband Plan for Our Future, GN Docket No. 09-51
Universal Service Contribution Methodology, WC Docket No. 06-122
Implementation of Section 224 of the Act, WC Docket No. 07-245**

Dear Ms. Dortch:

On behalf of the National Cable & Telecommunications Association (NCTA), James Assey, Jennifer McKee and I met with Zac Katz, Legal Advisor for Wireline Communications, International and Internet Issues for Chairman Genachowski on December 22, 2010, to discuss issues related to the above-captioned dockets. Consistent with our prior advocacy in these proceedings, we expressed NCTA's strong support for the fiscally responsible universal service, intercarrier compensation, and pole attachment reforms outlined in the National Broadband Plan and encouraged the Commission to move forward expeditiously in implementing those reforms.

We expressed concern regarding the continuing increases in the USF contribution factor and explained that constraining growth in the universal service high-cost fund, as recommended in the National Broadband Plan and proposed in the Commission's April 2010 Notice of Proposed Rulemaking in WC Docket No. 10-90, would reduce contribution burdens on consumers. We also explained how expanding the current revenue-based universal service contribution methodology to include residential broadband services could undermine the Commission's efforts to promote broadband adoption.

Finally, we encouraged the Commission to enact the pole attachment proposals set out in the May 2010 Further Notice of Proposed Rulemaking in WC Docket No. 07-245.

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Please do not hesitate to call should you have any questions regarding this filing.

Respectfully submitted,

/s/ Steven F. Morris

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cc: Z. Katz