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January 6, 2011

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

**Re: Notice of Ex Parte Presentation
The Federal-State Joint Board on Universal Service, CC Docket No. 96-45;
Jurisdictional Separations and Referral to the Federal-State Joint Board, CC Docket No. 80-286;
A National Broadband Plan for Our Future, GN Docket No. 09-51.**

Dear Ms. Dortch:

On January 5, 2011, I met with Commission staff to discuss the enclosed report, *Rural Association Intercarrier Model for Common Line 2010 Pool Members*, initially filed by NECA in the above-captioned dockets on December 30, 2010. The purpose of the meeting was to discuss NECA's data analysis processes leading to production of the report.

Participating in the meeting from NECA by telephone were Patricia Chirico, executive director, Tariffs, Rates, Costs, Average Schedules & Technology; Victor Glass, director, Demand Forecasting & Rate Development; and Joseph Prinzivalli, manager, Rate Development. Commission staff present at the meeting included Sharon Gillett, Marcus Maher, Al Lewis, John Hunter, Rebekah Goodheart, Douglas Slotten, Ted Burmeister, Patrick Halley, Elise Kohn, Rohit Dixit, and Kevin King.

Questions regarding this meeting may be directed to my attention.

Sincerely,

Enclosure

cc: Sharon Gillett
Carol Matthey
Randy Clarke
Amy Bender
Rebekah Goodheart
Elise Kohn
Albert Lewis
John Hunter
Pam Arluk
Mignon Clyburn
Michael Copps
Meredith Baker
Anthony Palermino
Tom Pugh
Steve Kolbeck
John Burke
Ray Baum
Larry Landis
James Cawley
Simon ffitch
Peter Bluhm, Esq.
Robert Loube

Rural Association Intercarrier Model for Common Line 2010 Pool Members
State Level Disaggregation
Calendar Year 2009 Data

STATE	Interstate Rev	Interstate Mou	Interstate Rate/Mou	Intrastate Rev	Intrastate Mou	Intrastate Rate/Mou	Access Rebalancing	Access Rebalancing per Line per Month	Total Access Lines	% of Rural Pool Participant Lines
AK	\$8,475,715	336,435,403	\$0.0252	\$30,107,438	281,347,194	\$0.1070	\$21,411,597	\$16.26	109,704	44%
AL	\$5,993,956	296,581,705	\$0.0202	\$11,801,051	245,921,487	\$0.0480	\$6,872,952	\$5.76	99,489	65%
AR	\$4,192,299	181,444,625	\$0.0231	\$14,229,620	114,363,376	\$0.1244	\$11,561,642	\$13.34	72,225	62%
AZ	\$3,064,700	84,576,595	\$0.0362	\$7,251,086	78,060,723	\$0.0929	\$3,974,057	\$9.19	36,030	49%
CA	\$6,943,562	265,806,823	\$0.0261	\$11,860,412	597,642,695	\$0.0198	\$501,901	\$0.29	144,093	43%
CO	\$1,939,790	81,171,072	\$0.0239	\$2,478,746	36,674,671	\$0.0676	\$1,561,034	\$3.88	33,535	79%
FL	\$3,384,995	305,173,493	\$0.0111	\$7,894,299	148,213,187	\$0.0533	\$5,772,118	\$6.37	75,549	77%
GA	\$10,070,875	479,612,615	\$0.0210	\$29,165,457	455,348,759	\$0.0641	\$17,118,173	\$7.00	203,725	56%
IA	\$16,895,143	494,496,639	\$0.0342	\$26,840,454	470,098,782	\$0.0571	\$12,020,483	\$4.93	203,215	64%
ID	\$5,024,431	107,027,990	\$0.0469	\$2,560,721	33,446,348	\$0.0766	\$1,278,038	\$3.04	35,091	71%
IL	\$4,884,661	242,314,811	\$0.0202	\$13,266,017	217,627,510	\$0.0610	\$7,446,107	\$7.54	82,268	56%
IN	\$7,325,799	328,480,206	\$0.0223	\$9,166,150	337,609,638	\$0.0272	\$158,928	\$0.11	125,241	71%
KS	\$8,553,354	286,773,452	\$0.0298	\$8,102,725	284,201,656	\$0.0285	\$701,349	\$0.53	109,633	89%
KY	\$9,075,627	411,558,946	\$0.0221	\$31,005,299	416,556,908	\$0.0744	\$20,443,632	\$11.38	149,685	61%
LA	\$3,128,767	139,581,744	\$0.0224	\$4,973,051	239,369,885	\$0.0208	\$1,548,833	\$1.92	67,098	73%
ME	\$4,247,737	165,474,131	\$0.0257	\$6,038,710	185,242,159	\$0.0326	\$1,858,191	\$2.06	75,134	37%
MI	\$5,011,595	164,690,665	\$0.0304	\$11,763,495	153,834,518	\$0.0765	\$7,807,467	\$8.43	77,184	64%
MN	\$16,602,456	576,934,885	\$0.0288	\$48,479,325	652,560,856	\$0.0743	\$28,195,922	\$7.58	310,038	49%
MO	\$5,680,896	236,310,842	\$0.0240	\$26,787,225	290,318,588	\$0.0923	\$19,097,295	\$15.13	105,164	83%
MS	\$2,608,211	107,667,719	\$0.0242	\$13,232,495	131,642,315	\$0.1005	\$9,781,151	\$17.38	46,886	81%
MT	\$11,399,425	289,799,182	\$0.0393	\$12,465,650	151,584,207	\$0.0822	\$6,340,075	\$5.69	92,798	95%
NC	\$13,760,606	610,990,225	\$0.0225	\$25,991,378	485,189,475	\$0.0536	\$11,568,229	\$3.53	273,459	8%
ND	\$13,653,384	349,507,325	\$0.0391	\$22,054,292	222,319,342	\$0.0992	\$13,260,136	\$7.46	148,081	88%
NE	\$4,941,007	143,362,697	\$0.0345	\$15,929,696	146,957,674	\$0.1084	\$10,670,503	\$14.32	62,094	67%
NM	\$5,071,296	101,312,989	\$0.0501	\$1,945,701	60,279,246	\$0.0323	\$29,755	\$0.07	35,607	79%
NV	\$3,999,374	94,602,655	\$0.0423	\$1,195,061	60,296,722	\$0.0198	\$0	\$0.00	29,778	42%
NY	\$6,218,567	291,617,328	\$0.0213	\$17,265,927	352,246,178	\$0.0490	\$9,624,313	\$6.01	133,351	27%
OH	\$3,888,424	144,531,491	\$0.0269	\$12,308,489	209,437,311	\$0.0588	\$6,553,848	\$6.37	85,790	43%
OK	\$12,204,624	421,467,617	\$0.0290	\$22,746,105	503,328,468	\$0.0452	\$7,301,212	\$3.61	168,613	97%
OR	\$3,231,356	150,419,305	\$0.0215	\$8,468,604	75,166,914	\$0.1127	\$6,825,344	\$8.37	67,981	53%
SC	\$19,066,657	1,196,189,581	\$0.0159	\$20,923,800	490,818,991	\$0.0426	\$12,213,845	\$2.59	392,273	49%
SD	\$14,215,022	300,205,973	\$0.0474	\$30,662,013	227,191,073	\$0.1350	\$17,867,084	\$11.46	129,880	61%
TN	\$11,629,426	679,729,536	\$0.0171	\$22,492,582	421,220,971	\$0.0534	\$15,388,744	\$4.56	281,356	57%
TX	\$11,806,165	348,049,732	\$0.0339	\$26,984,765	549,134,631	\$0.0491	\$7,179,975	\$2.65	226,020	57%
UT	\$8,326,445	129,505,803	\$0.0643	\$6,541,247	107,364,760	\$0.0609	\$1,421,288	\$1.79	66,236	67%
VA	\$5,928,746	302,761,432	\$0.0196	\$11,058,886	146,771,788	\$0.0753	\$8,674,926	\$7.13	101,438	12%
WA	\$3,845,685	165,278,330	\$0.0233	\$10,590,221	106,329,444	\$0.0996	\$7,903,298	\$9.26	71,141	61%
WI	\$17,071,826	744,366,822	\$0.0229	\$30,646,255	520,448,765	\$0.0589	\$16,898,897	\$4.78	294,396	48%
WV	\$1,431,330	54,800,336	\$0.0261	\$1,860,561	35,530,794	\$0.0524	\$967,078	\$5.08	15,880	48%
WY	\$2,923,215	110,391,124	\$0.0265	\$1,939,677	42,020,502	\$0.0462	\$710,551	\$1.76	33,700	82%
Other	\$35,327,260	1,398,954,539	\$0.0253	\$61,745,285	1,469,029,185	\$0.0420	\$20,075,331	\$2.90	577,297	8%
Total	\$343,044,409	13,319,958,383	\$0.0258	\$682,819,974	11,752,747,697	\$0.0581	\$360,585,301	\$5.52	5,448,151	51%

Footnotes:

¹ Interstate revenues and minutes for 2010 Common Line Pool members (N = 1140) come from 2009 NECA Settlements and Broadband Reform Data Request (BBDR July 2010) when necessary. Intrastate revenues and minutes come from BBDR and CABS. Responses from 646 companies representing 51% of the access lines were used and scaled to the pool using a scale factor based on access lines at the state level.

² MA, NH, PA and VT are shown in Other, due to limited sample in the BBDR. These 4 states represent 11% of the total interstate minutes.

³ American Samoa, Guam, Hawaii, New Jersey and Maryland are not in the report because BBDR did not collect data from those states/territories.

⁴ Access Rebalancing calculates the impact of setting intrastate rates equal to interstate rates.