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February 17, 2011

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Ex Parte

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-B204
Washington, D.C. 20554

Re: In the Matter of Federal-State Joint Board on Universal Service; High-Cost Universal Service Support, CC Docket 96-45; WC Docket No. 05-337

Dear Ms. Dortch:

Yesterday, John Scott of Verizon Wireless and the undersigned met with Trent Harkrader, Amy Bender, Elise Kohn, Nicholas Degani, Joseph Cavender, and (by telephone) Ted Burmeister of the Wireline Competition Bureau to discuss issues related to Verizon Wireless' status as an eligible telecommunications carrier (ETC). The discussion was consistent with the February 3, 2011 letter Verizon filed in the above-referenced dockets.¹

In particular, we explained that the arguments by some competitive ETCs that Verizon Wireless is not eligible to receive high cost universal service support at all, or that its eligibility is limited to subscriber lines previously served by its wholly-owned subsidiaries, Rural Cellular Corporation (RCC) and Alltel, cannot be squared with the Commission's own rules and decisions. For example, in the *Corr Wireless Order*, the Commission gave Verizon Wireless two options for receiving high cost support: Option A, which would have capped the company's universal service support at levels established at the time of the Verizon Wireless-Alltel merger, or Option B, under which its "high-cost universal service support will be recalculated each quarter *based on current data for that quarter*."² Option B necessarily contemplates that Verizon Wireless and its affiliated companies remain eligible to receive high-cost support following Verizon Wireless' acquisition of

¹ *In the Matter of Federal-State Joint Board on Universal Service; High-Cost Universal Service Support*, CC Docket No. 96-45, WC Docket No. 05-337, Letter from Tamara Preiss, Verizon, to Marlene H. Dortch, Secretary, FCC (filed Feb. 3, 2011) ("Verizon Feb. 3 Letter").

² *In the Matter of High-Cost Universal Service Support; Federal-State Joint Board on Universal Service; Request for Review by Corr Wireless Communications, LLC, of Decision of Universal Service Administrator*, CC Docket No. 96-45, WC Docket No. 05-337, Order and Notice of Proposed Rulemaking, 25 FCC Rcd. 12854, at ¶ 17 n.40 (2010)(emphasis added) ("*Corr Wireless Order*"); *recon. pending*.

RCC and Alltel and, furthermore, that its eligibility is not limited to legacy Alltel or RCC lines.³ Following integration of RCC and Alltel into Verizon Wireless, all customers – legacy RCC and Alltel customers, legacy Verizon Wireless customers, and those customers who selected Verizon Wireless following the mergers – receive service from the integrated Verizon Wireless operations.

At the request of Commission staff, we also provided the attached organizational chart relating to the ETC operations in the state of Nevada.

This letter is being filed electronically pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206. Please contact me if you have any questions.

Sincerely,

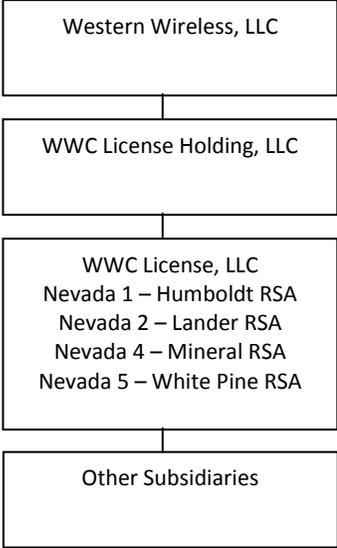


Attachment

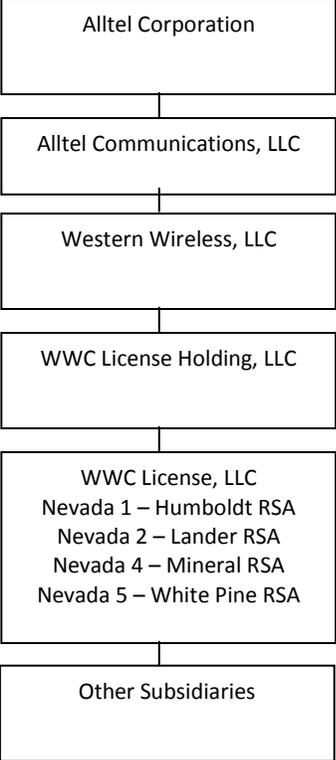
cc: Trent Harkrader
Amy Bender
Elise Kohn
Ted Burmeister
Nick Degani
Joseph Cavender

³ Verizon Feb. 3 Letter at 7.

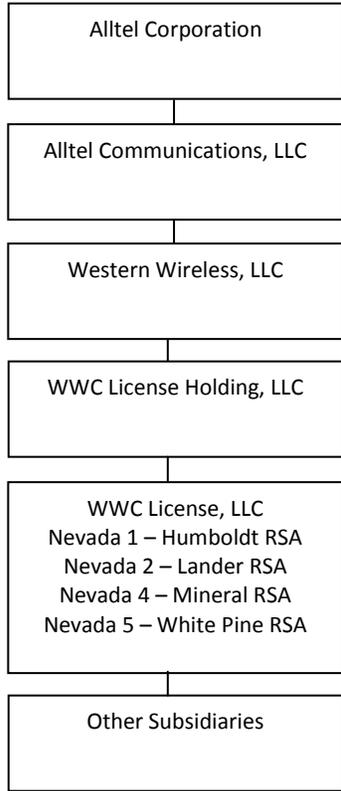
Pre 2005 - Western Wireless d/b/a Cellular One



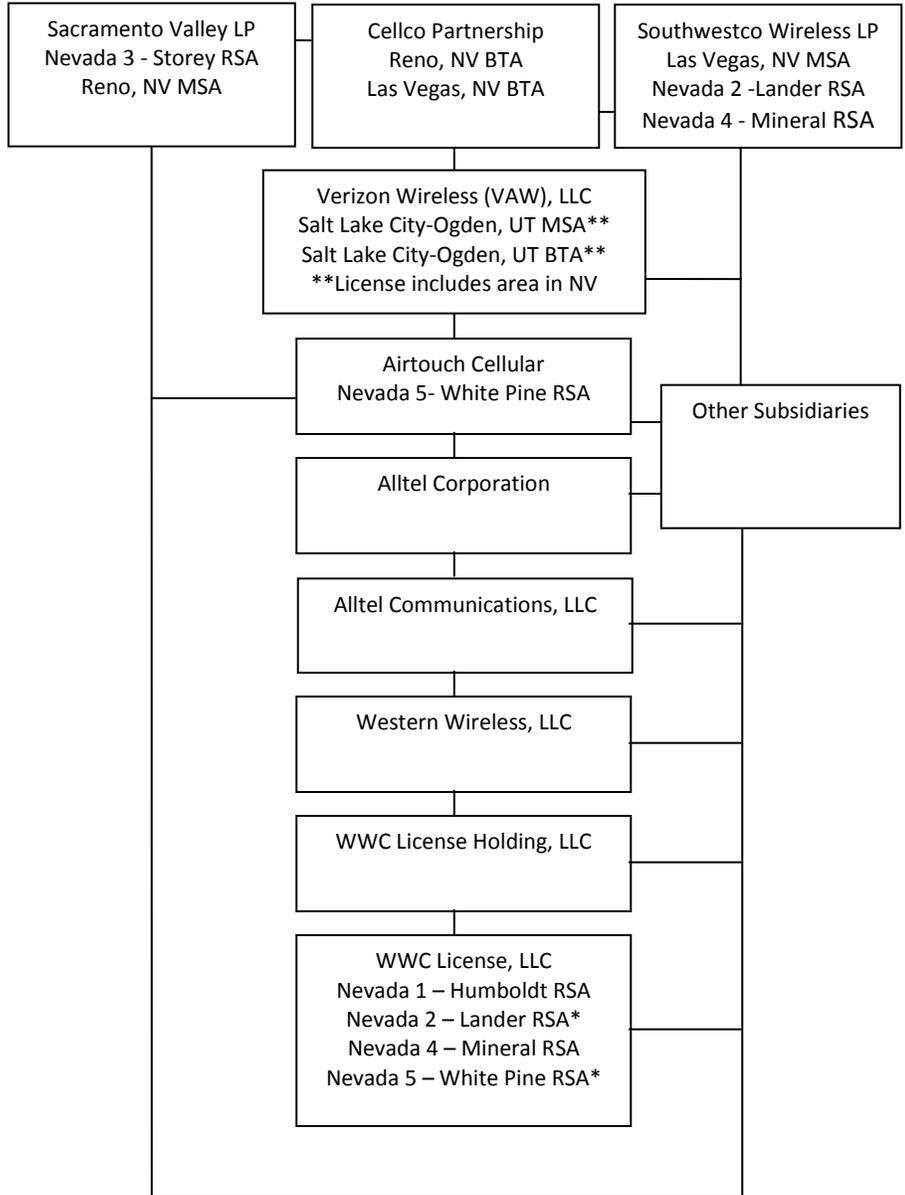
2005 – Alltel Corporation acquires Western Wireless Corporation and Affiliates d/b/a Alltel



2007 – Alltel Corporation and its Affiliates transfer ownership to Atlantis Holdings LLC d/b/a Alltel



2009 – Cellco Partnership through its wholly owned subsidiary Airtouch Cellular acquires Alltel Corporation and its Affiliates d/b/a Verizon Wireless



* Divested to AT&T Wireless as of 6/22/10