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March 11, 2011

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: *Implementation of Section 224 of the Act, WC Docket 07-245; A National Broadband Plan for Our Future, GN Docket No. 09-51*

Dear Ms. Dortch:

Today Kimberly Bennett and I, both of Windstream, spoke via telephone with Christi Shewman, Marcus Maher, Marvin Sacks, and Richard Kwiatkowski, all in the FCC's Wireline Competition Bureau, regarding pole attachment rate regulation. Windstream's statements were consistent with its prior advocacy in support of a pole attachment rate formula that will produce a uniformly low rate for all broadband providers. In particular, Windstream indicated that its need for rate protection is reflected in electric companies' terminations of existing agreements and aggressive requests for higher rental rates and revised terms and conditions. Windstream also responded to staff questions about why carriers no longer own poles at the same levels as electric companies.

Please feel free to contact me if you require any additional information.

Sincerely,

/s/

Jennie B. Chandra

Attachment

cc: Christi Shewman  
Marvin Sacks

Marcus Maher  
Richard Kwiatkowski