

Karen Brinkmann  
Direct Dial: (202) 637-2262  
karen.brinkmann@lw.com

555 Eleventh Street, N.W., Suite 1000  
Washington, D.C. 20004-1304  
Tel: +1.202.637.2200 Fax: +1.202.637.2201  
www.lw.com

# LATHAM & WATKINS LLP

## FIRM / AFFILIATE OFFICES

Abu Dhabi	Moscow
Barcelona	Munich
Beijing	New Jersey
Brussels	New York
Chicago	Orange County
Doha	Paris
Dubai	Riyadh
Frankfurt	Rome
Hamburg	San Diego
Hong Kong	San Francisco
Houston	Shanghai
London	Silicon Valley
Los Angeles	Singapore
Madrid	Tokyo
Milan	Washington, D.C.

March 11, 2011

## VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

**Re: *Comprehensive Universal Service Fund and Inter-carrier Compensation Reform* – CC Docket Nos. 96-45, 01-92, WC Docket Nos. 03-109, 05-337, 07-135, 10-90 and GN Docket No. 09-51 -- *Ex Parte* Presentation**

Dear Ms. Dortch:

On Thursday, March 10, 2011, Paul Sunu, Chief Executive Officer of FairPoint Communications, Inc., attended a dinner with other communications industry leaders at which Chairman Genachowski, Edward Lazarus, and Josh Gottheimer were present. Mr. Sunu raised the following points during this meeting:

- FairPoint appreciates the Commission's approach to address inter-carrier compensation reform and universal service reform in the same rulemaking. He noted that these two revenue sources make up a significant portion of rural local exchange carrier (RLEC) revenues.
- Shifting costs to the end-user may constrain the industry in light of increasing competitive pressures on end-user pricing.
- A reverse auction process for the distribution of universal service support or "Connect America" funding should not be implemented without also assessing obligations arising to incumbent LECs as "carrier of last resort."

LATHAM & WATKINS<sup>LLP</sup>

If you have any questions concerning this matter, please do not hesitate to call.

Very truly yours,

*/s/ Karen Brinkmann*

Karen Brinkmann  
*Counsel to FairPoint Communications, Inc.*

cc: Julius Genachowski  
Edward Lazarus  
Josh Gottheimer