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Via ELECTRONIC FILING

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

Re: **Notice of Ex Parte Presentation**
Stratos USF Petition for Clarification or Declaratory Ruling,
WC Docket No. 06-122; GN Docket No. 09-51

Dear Ms. Dortch,

On May 24, 2011, Alfred Mamlet, on behalf of Stratos Government Services, Inc. ("Stratos") had a telephone conversation with Vickie Robinson to discuss the above-captioned proceeding. The purpose of the call was to urge the Commission to resolve the Stratos Petition for Declaratory Ruling. The Stratos Petition was filed on September 15, 2009, and the Reply Comments were filed more than 18 months ago.

In addition, Mr. Mamlet made the substantive point that the Commission's text adopting the government contract exemption was ambiguous. In the 1997 USF rulemaking, the Commission said that "If an entity provides interstate telecommunications exclusively to public safety or government entities and does not offer services to others, that entity is not required to contribute" to universal service.¹ A subcontractor who serves exclusively government end-users could meet the literal terms of the Commission's exemption because the interstate telecommunications services would be "provide[d] . . . exclusively to public safety or government entities and . . . not offer[ed] to others . . ." Indeed, it is common for subcontractors to interconnect directly with government end-users and not to use any network facilities of prime contractors.

Respectfully submitted

/s/
Alfred M. Mamlet

cc: Vickie Robinson

¹ *Federal-State Joint Board on Universal Service*, 12 FCC Rcd. 8776 ¶800 (1997).