

Jennie B. Chandra
Senior Counsel, Federal Policy
Windstream Communications, Inc.
1101 17th Street, NW, Suite 802
Washington, DC 20036

(202) 223-7667
jennie.b.chandra@windstream.com



June 22, 2011

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

Re: *Connect America Fund*, WC Docket No. 10-90; *A National Broadband Plan for Our Future*, GN Docket No. 09-51; *Federal-State Joint Board on Universal Service*, CC Docket 96-45; *High-Cost Universal Service Support*, WC Docket No. 05-337; *Lifeline and Link-Up*, WC Docket No. 03-109; *Developing an Unified Inter-carrier Compensation Regime*, CC Docket No. 01-92; *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135; *Preserving the Open Internet*, GN Docket 09-191; *Broadband Industry Practices*, WC Docket 07-52; *2009 Consumer Information and Disclosure*, CG Docket No. 09-158; *Truth-in-Billing Format*, CC Docket No. 98-170; *IP-Enabled Services*, WC Docket No. 04-36

Dear Ms. Dortch:

On June 20, 2011, I spoke with Angela Kronenberg, Legal Advisor to FCC Commissioner Mignon Clyburn, about several issues before the FCC. First, I discussed Windstream's continued support for immediate adoption of reforms that would redistribute ongoing universal service support within price cap carriers' areas based on cost conditions in individual wire centers, rather than costs averaged across study areas or entire states. This discussion was consistent with Windstream's prior advocacy in the dockets listed above.¹ Second, in the context of inter-carrier compensation reforms, I asserted that it is critical that any set of comprehensive reforms include a meaningful opportunity for cost recovery – including, in particular, a new access recovery mechanism. This discussion, likewise, was consistent with prior Windstream advocacy in dockets listed above.² Finally, I argued that it was critical that any broadband performance testing and/or reporting requirements apply the

¹ See, e.g., Letter from Jennie B. Chandra, Senior Counsel – Federal Policy, Windstream Communications, Inc., to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 10-90, 05-337, 03-109, 07-135, GN Docket No. 09-51, CC Docket Nos. 96-45, 01-92 (filed Apr. 27, 2011).

² See, e.g., Reply Comments of Windstream Communications, Inc., WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45. GN Docket No. 09-51, at 13-14 (May 23, 2011).

same across wireline and wireless broadband services. Consistent with Windstream's prior advocacy in the above-mentioned dockets, I observed that imposing more requirements on wireline broadband providers than wireless broadband providers would distort the competitive marketplace, and could undermine a future universal service regime where companies compete for high-cost support.³

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

Sincerely,

/s/

Jennie B. Chandra

cc: Angela Kronenberg

³ See, e.g., Letter from Jennie. B. Chandra, Senior Counsel – Federal Policy, Windstream Communications, Inc., to Marlene H. Dortch, Secretary, FCC, CG Docket No. 09-158 (filed Oct. 19, 2010); Letter from Malena F. Barzilai, Regulatory Counsel & Director – Federal Government Affairs, to Marlene H. Dortch, Secretary, FCC, GN Docket Nos. 09-191, 10-127, 09-51, WC Docket Nos. 10-90, 05-337 (filed Dec. 15, 2010).