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

Notice of Ex parte

WC Docket Nos. 10-90, 07-135, 05-337 and 03-109, GN Docket No. 09-51 and CC Docket Nos. 01-92 and 96-45; Connect America Fund, a National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Support, Developing a Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-up

Dear Ms Dortch:

On June 22, 2011, Keith Galitz, Canby Telephone Association (Canby) and Michael Romano and Joshua Seidemann, National Telephone Cooperative Association (NTCA) met with the following members of the Federal Communications Commission's Wireline Competition Bureau: Amy Bender, Bradley Gillen Patrick Halley, and Kevin King to discuss the Commission's proposals to reform the universal service fund (USF) and intercarrier compensation (ICC) as set forth in the notice of proposed rulemaking (NPRM) in the referenced dockets. Brandon Zupancic of Canby Telephone Association and the undersigned participated via telephone.

Mr. Galitz presented company statistics and financial information to help explain the significant adverse impact that the USF and ICC reform proposals in the NPRM would have on Canby and Canby's subscribers. Mr. Galitz also explained the impact of un-billable access traffic terminating on Canby's network. This discussion included statistics culled from analysis of Canby's soft-switch data, and presented by Mr. Zupancic. Mr. Zupancic explained that a substantial portion of recent terminating traffic lacks sufficient information to identify the carrier(s) responsible for the call or the true jurisdictional nature of the calls received. The parties also explained that additional measures relating to carrier identification and standardized population of numbering fields beyond those phantom traffic measures suggested in the NPRM would ultimately be required to resolve the kinds of concerns identified by Canby.

On behalf of [Canby](#) and pursuant to Section 1.1206(b) of the Commission's rules, a redacted copy of this submission is filed for inclusion in the public record of the referenced proceeding.

Sincerely,



Chad Duval
Moss Adams LLP

cc: Keith Galitz, Canby Telephone Association
Brandon Zupancic, Canby Telephone Association
Amy Bender
Bradley Gillan
Patrick Halley
Kevin King