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June 24, 2011

***Via* Electronic Filing**
Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of *Ex Parte* Presentation In the Matter of Connect America Fund WC Docket No. 10-90; A National Broadband Plan for Our Future GN Docket No. 09-51; Establishing Just and Reasonable Rates for Local Exchange Carriers WC Docket No. 07-135; High-Cost Universal Service Support WC Docket No. 05-337; Developing an Unified Intercarrier Compensation Regime CC Docket No. 01-92; Federal-State Joint Board on Universal Service CC Docket No. 96-45; Lifeline and Link-Up WC Docket No. 03-109

Dear Ms. Dortch:

On June 23, 2011, James Groft, CEO and General manager of Northern Valley Communications, Keith Oliver, Vice President of Home Telephone Company, and I, on behalf of both the Rural Independent Competitive Alliance and the Rural Broadband Alliance (RBA), met with Commissioner Clyburn, Angela Kronenberg, Legal Advisor to Commissioner Clyburn, and Nat Brown of Commissioner Clyburn's staff. The purpose of our meeting was to discuss matters related to the above-referenced proceedings. The specific aspects of our discussion are set forth below.

With respect to these proceedings, Messrs. Groft and Oliver identified the three critical concerns and objectives of rural incumbent rate-of-return carriers and their affiliated rural CLECs: the opportunity to recover the substantial investments that have been made under the current rules; obtaining clarity as to the future rules so that they may know what investments may be prudently made; and reform of the Universal Service Fund to resolve the anomalous mismatch of a fund being transitioned to support Broadband based on a contribution system reliant on the declining base of the voice telephone model.

We also discussed RICA's long held position that the Identical Support rule should be promptly eliminated and our position that the support levels of all ETCs based upon their individual costs. For wireline CLECs, costs should be determined under the same rules as a rural ILEC.

We also discussed the fact that rural CLECs have relied on the rural CLEC access rules, consistent with established Commission policy, to recover a reasonable portion of the costs of deployment of advanced network infrastructure in formerly underserved areas where larger non-rural companies are the incumbents. We noted that on the basis both legal and policy considerations, that the rural CLEC access charge rates should not be reduced without commensurate consideration of established cost recovery requirements. Accordingly, rural CLECs should participate in any proposed restructure mechanism associated with the reduction of access charge levels in the same manner that rural incumbent carriers would participate.

I am filing this letter electronically with your office for inclusion in the record of each of the above-referenced proceedings pursuant to the Commission's Rules. If you have any questions, please do not hesitate to contact me at 202-333-1770.

Sincerely,

s/ Stephen G. Kraskin

cc: Commissioner Clyburn
Angela Kronenberg