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July 14, 2011

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

**RE: 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**

Dear Ms. Dortch:

On July 13, 2011, Michael Romano representing the National Telecommunications Cooperative Association; John Rose and Stuart Polikoff representing the Organization for the Promotion and Advancement of Small Telecommunications Companies; Jeff Dupree representing the National Exchange Carrier Association; Mark Gailey of Totah Communications; Paul Cooper of Fred Williamson and Associates, Inc.; and Derrick Owens and Gerry Duffy representing the Western Telecommunications Alliance met with Zac Katz, Chief Counsel and Senior Legal Advisor to Chairman Julius Genachowski; Michael Steffen of the Office of General Counsel; and Sharon Gillett, Carol Matthey, Rebekah Goodheart, Amy Bender, Victoria Goldberg, Brad Gillen, Trent Harkrader and Steve Rosenberg of the Wireline Competition Bureau, to discuss the Commission's pending universal service and intercarrier compensation rulemaking in the referenced dockets.

The participants discussed various options and alternatives regarding how high-cost support and access restructure mechanisms for rate-of-return rural telephone companies might fit within an overall Connect America Fund ("CAF"), including budgetary targets, the duration of specific mechanisms, the use of growth or adjustment factors, the specific steps and transition periods for access charge restructuring, the potential impacts of various access restructuring options upon access minute trends, the distribution of "shared sacrifice" among various industry sectors, and options for the adjustment of public service obligations with respect to changes in explicit high-cost support.

After Messrs. Katz and Steffen left the meeting, the rural telephone company and Wireline Competition Bureau representatives discussed some of the specific mechanics of the universal service-intercarrier compensation plan submitted in the April 18, 2011 comments of the represented associations, including capital expense constraints, the broadband adoption-based mechanism for allocation of interstate revenue requirements from the existing high-cost mechanisms to the CAF, and the purpose and calculation of the CAF benchmark.

Marlene H. Dortch, Secretary
July 14, 2011
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Pursuant to Section 1.1206(b) of the Commission's Rules, this submission is being filed for inclusion in the public record of the referenced proceedings.

Respectfully submitted,


Gerard J. Duffy

cc: Zac Katz
Michael Steffen
Sharon Gillett
Carol Matthey
Rebekah Goodheart
Amy Bender
Victoria Goldberg
Brad Gillen
Trent Harkrader
Steve Rosenberg