



National Cable & Telecommunications Association
25 Massachusetts Avenue, NW – Suite 100
Washington, DC 20001
(202) 222-2300

www.ncta.com

Steven F. Morris
Vice President and Associate General Counsel

(202) 222-2454
(202) 222-2446 Fax

July 26, 2011

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: 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 a 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 July 22, 2011, Terri Natoli on behalf of Time Warner Cable Inc., Mary McManus on behalf of Comcast Corporation, Sandy Wilson and Grace Koh on behalf of Cox Enterprises, Inc., and James Assey, Jennifer McKee and the undersigned on behalf of the National Cable & Telecommunications Association (NCTA) met with Zac Katz, Chief Counsel and Senior Legal Advisor for Chairman Genachowski, Sharon Gillett and Carol Matthey of the Wireline Competition Bureau, and Michael Steffen of the Office of General Counsel to discuss issues related to the above-captioned dockets.

The cable company representatives discussed the possibility of an industry consensus proposal on certain key aspects of universal service high-cost and intercarrier compensation reform. We expressed our belief that such consensus should lead to meaningful reform consistent with the principles identified by the Commission in its February 9, 2011 NPRM/FNPRM: 1) modernizing support for broadband; 2) fiscal responsibility; 3) accountability; and 4) market-driven policies. We further stressed the need for a cap on the annual amount of high-cost support collected and disbursed. We also discussed the importance of a specific timeframe and methodology for transitioning to unified terminating intercarrier compensation rates, including termination rates for calls delivered to IP-based networks.

Respectfully submitted,

/s/ **Steven F. Morris**

Steven F. Morris

cc: Z. Katz
S. Gillett
C. Matthey
M. Steffen