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August 3, 2011

Via Electronic Filing

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; 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 August 1, 2011, Susan Jin Davis and Mary McManus of Comcast Corporation (“Comcast”) and the undersigned of Lawler, Metzger, Keeney & Logan, outside counsel to Comcast, met with the following members of the Wireline Competition Bureau: Sharon Gillett, Carol Matthey, Al Lewis, Marcus Maher, Amy Bender, Rebekah Goodheart, Patrick Halley, and Jenny Prime. In the course of the discussion, Comcast’s representatives stated that the company regards the framework proposal¹ filed by a group of incumbent local exchange carriers (“LECs”) on July 29, 2011 as a useful contribution to the Commission’s ongoing effort to develop and implement a comprehensive plan for the reform of universal service high-cost support and intercarrier compensation.

Comcast’s representatives noted that Comcast’s views on the framework proposal are consistent with those set forth in a letter filed by the National Cable &

¹ See Joint Letter from AT&T, CenturyLink, FairPoint Communications, Frontier Communications, Verizon, and Windstream, to Chairman Julius Genachowski and Commissioners, WC Docket No. 10-90 (July 29, 2011).

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Telecommunications Association on July 29, 2011.² In particular, Comcast supports several basic elements of the proposal, such as the movement to a uniform default rate of \$0.0007 for all terminating voice traffic. Comcast noted, however, that other aspects of the proposal warrant further analysis and clarification, such as the use of wire centers to aggregate census blocks, the transitional access replacement mechanism for price cap carriers and the incumbent LECs' right of first refusal to receive high-cost support for broadband. Overall, Comcast's representatives stated that the company's two principal concerns are capping the size of the high-cost fund at the 2010 level and moving as quickly as possible to a stable, more economically efficient uniform default rate for all terminating voice traffic. Finally, Comcast's representatives emphasized that the company is committed to continuing a productive dialogue with other stakeholders in the industry in an effort to develop a workable comprehensive reform plan.

Pursuant to section 1.206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2), this *ex parte* notification is being filed for inclusion in the public record of the above referenced proceedings.

Respectfully submitted,

/s/ A. Richard Metzger, Jr.

A. Richard Metzger, Jr.

cc: Sharon Gillett
Carol Matthey
Al Lewis
Marcus Maher
Amy Bender
Rebekah Goodheart
Patrick Halley
Jenny Prime

² See Letter from National Cable & Telecommunications Association, to Marlene H. Dortch, FCC Secretary, WC Docket No. 10-90 (July 29, 2011).