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Via Electronic Filing

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

Re: Notice of Oral Ex Parte Presentation,
WC Docket Nos. 10-90, 07-135, 05-337, 03-109;
CC Docket Nos. 01-92, 96-45;
GN Docket No. 09-51

Dear Ms. Dortch:

Pursuant to 47 CFR § 1.1206(b), this is to notify you that, on August 18, 2011, Mr. Michael Shultz, Vice President, Regulatory & Public Policy of Consolidated Communications ("Consolidated"), and the undersigned made a presentation concerning the above-captioned dockets to Christine Kurth, Legal Advisor to Commissioner McDowell. The attached written outline was provided during the presentation.

We explained that Consolidated is an incumbent LEC that serves three study areas under price cap regulation, and one study area under rate-of-return regulation, but is not a signatory to the USF/ICC reform proposal presented by larger price cap companies. Consolidated has a number of unanswered questions regarding the proposal, as well as concerns about how it would impact smaller companies, especially those that recently and voluntarily converted to price cap regulation. These companies received frozen per-line Interstate Common Line Support in exchange for reducing their switched access rates to target levels. Under the recent proposal, companies in this position apparently would lose all legacy support within five years without being relieved of any of the commitments they made when electing price cap regulation. Consolidated also expressed concerns about how the proposed forward-looking cost model would operate, and stressed that all assumptions and data sources on which the model relies should be subject to public scrutiny. We suggested that the proposal to deny any support to census blocks with a projected cost to serve over $256 per line could have unintended consequences including stranding existing wireline investment in these areas, and possibly causing some customers who have broadband access today to lose it due

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to unaffordability. Consolidated also suggested that the Commission might choose to phase-in the buildout requirements for CAF recipients, rather than require 4 MB coverage of all supported areas within five years, to conserve funding resources.

With respect to intercarrier compensation, Consolidated is concerned with whether the target rate of $.0007 for termination would cover smaller companies' long-run incremental cost, and whether the proposed divergence between originating and terminating access charges might have unintended consequences. Consolidated also noted that the recent proposal would have different access recovery mechanisms for price cap and rate-of-return carriers, based on different price benchmarks, and suggested that these mechanisms should be consistent for all carriers.

Respectfully submitted,

/s/

Russell M. Blau

cc: Christine Kurth
Michael Shultz