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September 12, 2011

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
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 an Unified Intercarrier Compensation Regime, CC Docket No. 01-92; Federal-State Joint Board on Universal Service, CC Docket No. 96-45; IP-Enabled Services, WC Docket No. 04-36

Dear Ms. Dortch:

On September 9, 2011, Chris Miller, of Verizon, and I met with Zachary Katz, Chief Counsel and Senior Legal Advisor to Chairman Genachowski, Sharon Gillett, Chief of the Wireline Competition Bureau, Carol Matthey, Deputy Chief of the Wireline Competition Bureau, and Steven Rosenberg, Chief Data Officer of the Wireline Competition Bureau. The purpose of the meeting was to discuss America's Broadband Connectivity Plan (the "ABC Plan") filed by AT&T, CenturyLink, FairPoint, Frontier, Verizon and Windstream as well as the consensus framework our companies reached with the National Telecommunications Cooperative Association (NTCA), Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO), Western Telecommunications Alliance (WTA) and USTelecom.

In the meeting, we addressed Verizon's support for the ABC Plan and said that the Commission should adopt the Plan as soon as possible. We answered questions regarding the Plan. Specifically, we indicated that the "right of first refusal" for universal service broadband funding in certain areas was an important element of the Plan because it balances competitive neutrality with the need to leverage existing facilities in high-cost areas. We also discussed the importance of pricing flexibility under the Plan and the need to allow for small increases in subscriber line charges during the transition to a more rational intercarrier compensation system. As a related matter, we addressed the economic challenges facing traditional wireline providers and the financial position of the Verizon ILECs. Finally, we discussed the different broadband speed capabilities of different technologies.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Kathleen Grillo".

cc: Zachary Katz
Sharon Gillett
Carol Matthey
Steven Rosenberg