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EX PARTE

September 15, 2011

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

RE: *In the Matters of 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; *Lifeline and Link-Up*. WC Docket No. 03-109; *Universal Service Contribution Methodology*, WC Docket No. 06-122; *Numbering Resource Optimization*. CC Docket No. 99-200; *Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, CC Docket No. 96-98; *Intercarrier Compensation for ISP-Bound Traffic*, CC Docket No. 99-68; *IP-Engaged Services*, WC Docket No. 04-36

Dear Ms. Dortch:

On September 13, 2011, Steve Davis, Senior Vice President-Public Policy and Government Relations for CenturyLink, met with Zachary Katz, Chief Counsel and Senior Legal Advisor to Chairman Julius Genachowski, Sharon Gillet, Chief-Wireline Competition Bureau, and Carol Matthey, Deputy Bureau Chief, Wireline Competition Bureau, to discuss the ABC Plan filed on July 29, 2011 in the above-captioned dockets,<sup>1</sup> and to encourage the Commission to adopt an order implementing the ABC Plan and the consensus framework referenced in the joint letter filed with trade associations representing rural rate-of-return carriers filed in the same dockets on the same day.<sup>2</sup> Specifically, we discussed the consumer benefits of the proposal and the consumer protections associated with the increased pricing flexibility for subscriber line charges;

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<sup>1</sup> Letter from Robert W. Quinn, Jr., AT&T; Steve Davis, CenturyLink; Michael T. Skrivan, FairPoint; Kathleen Q. Abernathy, Frontier; Kathleen Grillo, Verizon; and Michael D. Rhoda, Windstream; to Marlene H. Dortch, FCC, CC Docket Nos. 01-92, 99-200, 96-98, 99-68; WC Docket Nos. 05-337, 07-135, 10-90, 03-109, 06-122, 04-36; GN Docket No. 09-51 (filed July 29, 2011).

<sup>2</sup> Letter from Jonathan Banks, USTelecom, to Marlene H. Dortch, FCC, CC Docket Nos. 01-92, 96-45, 99-200, 96-98, 99-68; WC Docket Nos. 05-337, 07-135, 10-90, 03-109, 06-122, 04-36; GN Docket No. 09-51, Attach. at 1 (filed July 29, 2011).

Marlene H. Dortch  
September 15, 2011  
Page 2

the operation of the alternate technology cap; the capabilities and public policy benefits of the recommended speeds for the supported broadband network; the operation of the right-of-first-refusal to avoid stranding broadband and telecommunications facilities deployed pursuant to carrier-of-last-resort obligations and existing universal service support; the legal analysis supporting the terminating rate of \$0.0007; and the operation of the proposed access replacement mechanism. The discussion was consistent with the text of the ABC Plan as filed.

Sincerely,

/s/ Melissa Newman

Copy (via email) to:  
Zachary Katz  
Sharon Gillett  
Carol Matthey