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September 15, 2011

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

RE: WC Docket No: 06-122; Petition of U.S. Satellite Corporation for Declaratory Ruling, or, in the Alternative, For Waiver

Dear Ms. Dortch:

On September 13, 2011, Brad Beckstrom, with SUPERVALU, Inc., and George Foote and I, with Dorsey & Whitney LLP, as representatives of U.S. Satellite Corporation (“USSC”), met with Wireline Competition Bureau staff to discuss USSC’s Petition that was filed with the Commission on March 17, 2011, and referenced above (USSC’s Petition).. FCC staff members participating in the meeting were Vickie Robinson, Claudia Fox, and Carol Pomponio.

The discussion focused on USSC’s history as a division of a grocery-store chain, its relationship with its parent, SUPERVALU, Inc., and the services that it currently provides to SUPERVALU’s retail stores as well as to other third parties. USSC explained how the proper characterization of SUPERVALU is not an “end-user” of USSC’s telecommunications services as contemplated by the Universal Service Fund (“USF”) rules and orders, as explained further in USSC’s Petition.

USSC explained that its position is not that USSC should be eligible for the “self-provider exemption” found in the FCC Form 499-A instructions. Rather, USSC suggested that the USF rules and orders do not require that USSC report as end-user telecommunications revenues the intra-affiliated group accounting attendant to the relationship of a 100%-owned subsidiary to its parent company.

Please do not hesitate to contact me if you require any further information.

Respectfully submitted,

DORSEY & WHITNEY LLP

/S/

Karly Baraga Werner

Associate