

**Kathleen Grillo**  
Senior Vice President  
Federal Regulatory Affairs



September 16, 2011

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**Ex Parte**

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

**Re: WC Docket No. 10-90; GN Docket No. 09-51; WC Docket No. 07-135; WC Docket No. 05-337; CC Docket No. 01-92; CC Docket No. 96-45; WC Docket No. 04-36; GN Docket No. 09-191; WC Docket No. 07-52; GN Docket No. 11-121**

Dear Ms. Dortch:

On September 14, 2011, Tom Tauke, Michael Glover, and the undersigned of Verizon met with Commissioner Robert McDowell; Angela Giancarlo, Chief of Staff and Senior Legal Advisor to Commissioner McDowell; and Christine Kurth, Policy Director and Wireline Counsel to Commissioner McDowell. 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, and other matters.

In the meeting, we emphasized that universal service and intercarrier compensation reform requires significant compromises on entrenched positions from all parties. In crafting the ABC Plan, Verizon and the other plan supporters have made such compromises. We encouraged the Commission to act quickly to reform these broken systems.

We also discussed key features of the ABC Plan. In particular, we emphasized that the ABC Plan and the companion agreement with associations representing rural rate-of-return ILECs would bring fiscal discipline to the USF through an overall budget for the high-cost fund of \$4.5 billion per year. We also explained that the Commission should conclude that VoIP services are interstate services, and that the Commission should eliminate any legacy regulations that act as a barrier to IP broadband networks. Specifically, the Commission should eliminate legacy federal ETC regulations for companies that receive legacy high-cost support once this support is eliminated.

Finally, we generally discussed the need to move forward with efforts to free up additional spectrum for commercial use as the Commission looks for ways to expand access to wireless broadband in additional areas.

Please contact me if you have any questions.

Sincerely,

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

cc: Commissioner McDowell  
Angela Giancarlo  
Christine Kurth