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EX PARTE

*VIA ECFS*

September 28, 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 a 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-Enabled Services, WC Docket No. 04-36*

Dear Ms. Dortch:

On September 27, 2011, CenturyLink met, in separate meetings, with Zachary Katz, Chief Counsel and Senior Legal Advisor to Chairman Julius Genachowski; Sharon Gillett, Chief-Wireline Competition Bureau (WCB), and Carol Matthey, Deputy Bureau Chief-WCB, and Michael Steffen of the Office of General Counsel; and with Christine Kurth, Legal Advisor to Commissioner Robert McDowell, to discuss intercarrier compensation and universal service fund reform and the ABC Plan filed on July 29, 2011 in the above-captioned dockets.<sup>1</sup>

In the meeting with Mr. Katz, *et al.*, CenturyLink was represented by Steve Davis and Melissa Newman. In the meeting with Ms. Kurth, CenturyLink was represented by Steve Davis, Melissa Newman and Jeff Lanning.

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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, 96-45; WC Docket Nos. 05-337, 07-135, 10-90, 03-109, 06-122, 04-36; GN Docket No. 09-51 (filed July 29, 2011).

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In the meetings, CenturyLink encouraged the Commission to adopt an order implementing the ABC Plan and the consensus framework referenced in the joint letter filed with the trade associations representing rural rate-of-return carriers filed in the same dockets. We discussed the importance of adopting now and implementing the Universal Service Fund disbursement schedule proposed in the ABC Plan. Specifically, we discussed how the Commission could adopt a broadband cost model in time to meet that schedule, and how the ABC Plan could be adopted and implemented on schedule if there were delays in adopting the model. CenturyLink also discussed the right-of-first-refusal, which we believe is a necessary component in order to avoid stranding broadband-capable telecommunications facilities deployed pursuant to carrier-of-last resort obligations and existing universal service support. CenturyLink believes strongly that any USF and ICC reform must be implemented together.

Sincerely,

/s/ Melissa Newman

Copy (via email) to:

Zachary Katz ([Zachary.Katz@fcc.gov](mailto:Zachary.Katz@fcc.gov))  
Sharon Gillett ([Sharon.Gillett@fcc.gov](mailto:Sharon.Gillett@fcc.gov))  
Carol Matthey ([Carol.Matthey@fcc.gov](mailto:Carol.Matthey@fcc.gov))  
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