



October 5, 2011

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

**Re: *Ex Parte* Communication: WC Docket Nos. 10-90, 07-135, 05-337, 03-109;
GN Docket No. 09-51; CC Docket Nos. 01-92, 96-45**

Dear Ms. Dortch:

On October 4, 2011, Michael Schultz, Vice President, Regulatory and Public Policy, Consolidated Communications; Kevin Hess, Senior Vice President – Government & Regulatory Affairs, TDS Telecom; Patricia Rupich, Senior Manager – Regulatory, Government Relations, Cincinnati Bell; Genevieve Morelli, President of the Independent Telephone & Telecommunications Alliance (“ITTA”); and the undersigned met separately with Angela Kronenberg, Wireline Legal Advisor to Commissioner Clyburn, and Margaret McCarthy, Wireline Policy Advisor to Commissioner Copps, to discuss the universal service and intercarrier compensation reforms being considered by the Commission in the above-referenced proceedings. On the same day, Ms. Rupich, Ms. Morelli, Mr. Schultz, Drew Petersen, Vice President – External Affairs and Communications, TDS Telecom, and the undersigned met with Zac Katz, Chief Counsel and Senior Legal Advisor to Chairman Genachowski; Brad Gillen, Associate Bureau Chief, Wireline Competition Bureau; and Michael Steffen, Special Counsel, Office of General Counsel, to discuss the same issues.

On October 5, 2011, Patricia Rupich, Senior Manager – Regulatory, Government Relations, Cincinnati Bell; Genevieve Morelli, President of ITTA; and the undersigned met with Christine Kurth, Policy Director & Wireline Counsel to Commissioner McDowell, to discuss the universal service and intercarrier compensation reforms being considered by the Commission in the above-referenced proceedings.

The attached presentation details the issues ITTA discussed during the meetings. In particular, ITTA emphasized the need to build a Commission review process into any intercarrier compensation transition plan the Commission adopts and reiterated its support for the provision of a right-of-first-refusal for incumbent carriers under any revised high-cost universal service support program approved by the Commission.

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Please do not hesitate to contact me with any questions regarding this submission.

Respectfully submitted,

A handwritten signature in cursive script that reads "Micah M. Caldwell".

Micah M. Caldwell
Vice President, Regulatory Affairs

Attachment

cc: Zac Katz
Margaret McCarthy
Christine Kurth
Angela Kronenberg
Brad Gillen
Michael Steffen