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October 6, 2011

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

Re: 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

Dear Ms. Dortch,

On October 4, 2011, Jeffrey Gardner (President and CEO), Michael Rhoda (Senior Vice President, Government Affairs), and the undersigned, all of Windstream, met with FCC Chairman Julius Genachowski, Edward Lazarus (Chief of Staff), and Zachary Katz (Chief Counsel and Senior Legal Advisor) regarding universal service and intercarrier compensation reforms. Windstream reaffirmed its commitment to providing broadband service in rural America and expressed appreciation for Chairman Genachowski's leadership on reforms to the universal service and intercarrier compensation systems.

Windstream asserted that the America's Broadband Connectivity Plan ("ABC Plan") provides a fiscally responsible and workable approach for universal service reform. Under the Plan, we explained that new Connect American Fund support would focus on high-cost areas lacking an economic case for private investment, and this funding would benefit consumers significantly by enabling deployment and sustained operation of robust broadband services that would not exist absent support. In addition, we discussed the need to maintain a right of first refusal to expedite distribution of broadband funding to high-cost areas.

Addressing intercarrier compensation, we stressed the need to implement proposed universal service reforms at the same time as intercarrier compensation rate reductions called for by the ABC Plan. We also noted that it was critical for the Commission to provide reasonable opportunities – including a transitional access recovery mechanism and moderate subscriber line charge increases – to help recover revenues that will be reduced by reform.

Please contact me if you require any further information.

Sincerely,

/s/ Eric N. Einhorn

Eric N. Einhorn

cc: Chairman Julius Genachowski
Edward Lazarus
Zachary Katz