

KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

WASHINGTON HARBOUR, SUITE 400

3050 K STREET, NW

WASHINGTON, D.C. 20007-5108

(202) 342-8400

FACSIMILE

(202) 342-8451

www.kelleydrye.com

NEW YORK, NY

CHICAGO, IL

STAMFORD, CT

PARSIPPANY, NJ

LOS ANGELES, CA

BRUSSELS, BELGIUM

AFFILIATE OFFICE

MUMBAI, INDIA

DIRECT LINE: (202) 342-8544

EMAIL: jheitmann@kelleydrye.com

October 14, 2011

VIA ECFS

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

Re: Notice of Ex Parte – WC Docket Nos. 11-42, 03-109 and CC Docket No. 96-45

Dear Ms. Dortch:

On Wednesday, October 12, 2011, the undersigned counsel, on behalf of the members of the Link Up for America Coalition (“Coalition”),¹ participated in a brief telephone conversation with Kim Scardino of the Wireline Competition Bureau to discuss proposed reforms to the Link Up component of the Commission’s Low Income Universal Service program.

During the call, we discussed the Commission’s proposed reforms to the Link Up subsidy program and the Coalition’s Code of Conduct and Interim De-Duping Process self-regulatory initiatives designed to produce a significant near-term reduction in waste in, and substantial expenditure savings for, the Commission’s Lifeline and Link Up programs. The Code of Conduct and Interim De-Duping Process were submitted with the Coalition October 3rd *Ex Parte*. Additional explanation of the Interim De-Duping Process was provided with Coalition October 6th *Ex Parte*. The purpose of the call was to ensure that the requested explanations of cost savings figures included in the Coalition October 6th *Ex Parte* were satisfactory. During the call, I also confirmed that two additional ETCs, YourTel America and TerraCom, would be participating in the interim de-duping process and that additional savings would result from this

¹ A member listing was provided in footnote 2 of the Coalition’s October 3, 2011 *ex parte* submission. See *Ex Parte* Presentation of the Link Up for America Coalition, WC Docket No. 11-42 et al. at n.2 (Oct. 3, 2011) (“Coalition October 3rd *Ex Parte*”).

KELLEY DRYE & WARREN LLP

Marlene H. Dortch
October 14, 2011
Page Two

additional voluntary participation in the self-regulatory program. I also explained that the Coalition's efforts to secure participation by Nexus in these self-regulatory initiatives had not yet proven successful. Finally, I reiterated Coalition concerns with potential changes to the Link Up program such as cost categorization that could potentially create undue burdens and uncertainty for ETCs and for USAC.

In accordance with the Commission's rules, this letter is being filed electronically for inclusion in the public record of the above-referenced proceedings.

Respectfully submitted,



John J. Heitmann

cc: Kim Scardino