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October 17, 2011

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

Re: 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

Dear Ms. Dortch:

On October 14, 2011, Michael Powell, President and CEO of the National Cable & Telecommunications Association (NCTA), and I met with Commissioner McDowell, his Policy Director and Wireline Counsel Christine Kurth, his Media Legal Advisor Erin McGrath, and interns Emily Bronner and David Baker to discuss issues related to the above-captioned dockets. On October 13, 2011, Steve Morris and I of NCTA met with Ms. Kurth to discuss the same issues. We urged the Commission to expeditiously reform the universal service high-cost support and intercarrier compensation mechanisms. Specifically, we stated that the Commission should adopt meaningful, enforceable fiscal constraints in the form of a cap on high-cost support; should ensure that its reforms are competitively and technologically neutral, rather than providing a right of first refusal to incumbent phone companies; should target support to areas that are not served by an unsubsidized competitor; and should provide certainty regarding the ability of providers to receive compensation for terminating calls, regardless of the technology used by the end user of the call.

Respectfully submitted,

/s/ Jennifer K. McKee
Jennifer K. McKee

cc: R. McDowell
C. Kurth
E. McGrath
E. Bronner
D. Baker