



1634 Eye Street NW, Suite 510
Washington, D.C. 20006

Jeffrey E. Dupree
Vice President
Government Relations
PH 202-682-2495
FX 202-682-0154
jdupree@neca.org

October 18, 2011

Ex Parte Notice

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

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 01-92; Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Lifeline and Link-Up, WC Docket No. 03-109

Dear Ms. Dortch:

On October 17, 2011, Jim Frame, Pat Chirico and the undersigned of NECA met with Al Lewis, Victoria Goldberg, Doug Slotten, Kevin King, and Daniel Ball of the Wireline Competition Bureau. Mr. Frame, Ms. Chirico and Mr. King participated via telephone. During the meeting NECA raised potential issues with the proposed restructure mechanism (RM) calculation in the Commission's intercarrier compensation (ICC) reform plan and the impact on rate of return companies. In particular, NECA discussed the impact of the Commission's proposed RM calculation on NECA pooling companies and the possibility for shortfalls in recovery of interstate switched access costs.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS with your office.

Sincerely,

A handwritten signature in black ink that reads "Jeffrey E. Dupree". The signature is written in a cursive, flowing style.

cc: Al Lewis
Victoria Goldberg
Doug Slotten
Daniel Ball
Kevin King