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VIA ELECTRONIC FILING

EX PARTE

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

Re: *WC Docket No. 10-90, Connect America Fund; GN Docket No. 09-51, National Broadband Plan for our Future; WC Docket No. 07-135, Establishing Just and Reasonable Rates for Local Exchange Carriers; WC Docket No. 05-337, High-Cost Universal Service Support; CC Docket No. 01-92, Developing a Unified Intercarrier Compensation Regime; CC Docket No. 96-45, Federal State Joint Board on Universal Service; WC Docket No. 03-109, Lifeline and Link-Up*

Dear Ms. Dortch:

On October 17, 2011, Mike Rhoda and Eric Einhorn, from Windstream Communications, Inc. (“Windstream”), met with Margaret McCarthy, policy advisor to Commissioner Michael J. Copps. Windstream discussed its potential concerns with certain portions of the draft order for universal service and intercarrier compensation reform. Windstream noted that the America’s Broadband Connectivity Plan (“ABC Plan”) strikes a careful balance and represents a significant compromise for the participating companies. Windstream also explained that the critical ways in which the draft order apparently diverges from the ABC Plan likely would have a significant impact on the very companies that are most capable of deploying broadband in high-cost areas and the consumers they serve, and would result in substantially less broadband deployment than would result under the ABC Plan.

In particular, Windstream observed that the draft order apparently provides for certain elimination of current intercarrier compensation and universal service high-cost funding but provides for uncertain replacement of those revenues. With regard to an interim high-cost mechanism, Windstream emphasized the need for flexibility in how support is spent, and asserted that the number of locations that may be addressed with new support will depend on company-specific costs for locations to be served, as well as the amount of funding disbursed and the length of time funding will be available. Windstream also discussed potential concerns with the amount of funding available under the proposed Connect America Fund in areas served

by price cap companies as compared to the cost of the expected obligations and required networks.

Pursuant to Commission rules, please include a copy of this filing in each of the above-referenced dockets. Please feel free to contact me if you have any questions.

Sincerely yours,

/s/ Malena F. Barzilai

Malena F. Barzilai

cc: Margaret McCarthy