



Federal Regulatory Affairs  
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October 21, 2011

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
Washington, D.C. 20554

Re: *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; *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92; *Connect America Fund*, WC Docket No. 10-90; *High Cost Universal Service Support*, WC Docket No. 05-337; *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45

Dear Ms. Dortch:

On October 20, 2011, I met with Margaret McCarthy, Policy Advisor, Wireline, to Commissioner Copsps, to discuss the above-captioned proceedings.

Frontier emphasized its support for the America's Broadband Connectivity Plan ("ABC Plan") and Joint Framework filed in these dockets. The parties discussed that the ABC Plan would require evolving the state role for intercarrier compensation and Universal Service. The parties discussed the different options for subscriber line charge (SLC) increases enumerated in the ABC Plan and how they would affect overall recovery if combined with other SLC increases to businesses. The parties also discussed the effects that different benchmark calculations would have on the need for a recovery mechanism from the Universal Service Fund. The parties also discussed the ABC Plan's targeted approach to providing service only to high-cost areas but Frontier stressed that obligations must be commensurate with the level of funding. Finally the parties discussed the possibility of an interim proposal for targeting support to high cost areas and the effects of calculating the support mechanism with different base dollar amounts.

Please feel free to contact me with any further questions.

Sincerely,

/s/

Michael D. Saperstein, Jr.  
Director of Federal Regulatory Affairs  
Frontier Communications  
(203) 614-4702

cc: Margaret McCarthy