



October 21, 2011

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

Re: WC Docket No. 10-90; GN Docket No. 09-51; WC Docket
No. 07-135; WC Docket No. 05-337; CC Docket No. 01-92;
CC Docket No. 96-45; WC Docket No. 04-36

Dear Ms. Dortch:

On Friday, October 21, 2011, Jeff Gardner and Mike Rhoda (Windstream) and Walter McCormick and I (USTelecom) met with Chairman Genachowski, Eddie Lazarus, and Zac Katz (Office of Chairman Genachowski) and Michael Steffen (OGC) to discuss universal service and intercarrier compensation reforms.

Mr. Gardner and Mr. McCormick began the meeting by describing the process and dynamics of assembling a broad industry coalition reform plan. Mr. Gardner also discussed the financial challenges of providing broadband service in rural America. Mr. Rhoda described the excessive financial pressures that the currently proposed approach, as we understand it, to reforming intercarrier compensation places on, in particular, mid-sized carriers serving very rural areas of the country, and the difficulties it creates in managing the transition from providing legacy service with legacy Universal Service Funding to providing broadband services based on a new method of supporting broadband networks. We discussed approaches that would allow such companies to better accomplish the transition and that would minimize any disruptions to consumers or businesses during the transition.

Pursuant to Commission rules, please include a copy of this filing in each of the above-referenced dockets.

Sincerely,

A handwritten signature in blue ink that reads "Jonathan Banks".

Jonathan Banks

c: Eddie Lazarus
Zac Katz