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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 , Universal Service Reform – Mobility Fund, WT Docket No. 10-208*

Dear Ms. Dortch:

On February 3, 2012, Eric Einhorn from Windstream Communications, Inc., talked via phone with Christine Kurth, Policy Director and Wireline Counsel to Commissioner Robert McDowell. On February 3, 2012, Eric Einhorn and I also spoke with Michael Steffen, Chief Counsel and Senior Legal Advisor to Chairman Julius Genachowski.

These discussions were consistent with the Petition for Reconsideration and/or Clarification that Windstream jointly filed with Frontier.<sup>1</sup> In particular, Windstream reiterated its request that the FCC confirm that the Order did not reduce rates for toll traffic originating on the PSTN and terminating in IP format. Windstream, in its meeting with Mr. Steffen, also urged that the FCC reconsider its “one unserved location per \$775” deployment requirement for Connect America Fund Phase I support. Windstream asked that this requirement be replaced with a more targeted accountability mechanism, which would account for differences in individual companies’ service territories and ensure that companies are not punished as a result of having deployed broadband aggressively in rural areas.

Please contact me if you have any questions regarding this submission.

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<sup>1</sup> See Petition for Reconsideration and/or Clarification filed by Frontier Communications Corp. and Windstream Communications, Inc., WC Docket 10-90, et al., at 21 (Dec. 29, 2011).

Sincerely,

/s/ Jennie B. Chandra

Jennie B. Chandra

cc: Christine Kurth  
Michael Steffen