

Jennie B. Chandra  
Senior Counsel, Federal Policy  
Windstream Communications, Inc.  
1101 17<sup>th</sup> Street, N.W., Suite 802  
Washington, DC 20036

(202) 223-7667  
jennie.b.chandra@windstream.com



February 13, 2012

**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 9, 2012, Michael Rhoda, Eric Einhorn, and I, of Windstream Communications, Inc., met with Michael Steffen of Chairman Genachowski's office; Sharon Gillett, Carol Matthey, Joseph Cavender, all of the Wireline Competition Bureau; and Paul de Sa of the Office of Strategic Planning & Policy Analysis. Steven Rosenberg of the Wireline Competition Bureau joined the meeting by telephone.

In this meeting, Windstream discussed its pending request for reconsideration of the "one unserved location per \$775" deployment requirement for Connect America Fund Phase I support.<sup>1</sup> Windstream asserted that this requirement should be replaced with a more targeted mechanism, which would account for differences in individual companies' service territories and ensure that unserved consumers in Windstream's high-cost areas may benefit from Phase I support. Without this reform, Windstream noted that consumers served by carriers that have aggressively deployed broadband in rural areas may not be able to benefit from funds, because \$775 per unserved location may be insufficient to offset the costs to serve many of the carriers' remaining, truly high-cost unserved locations. Finally, Windstream argued that the FCC should seek to encourage the greatest amount of private sector investment in broadband deployment –

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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).

which will only occur if carriers that are willing to invest the most in rural broadband deployment are able to participate meaningfully in Connect America Fund Phase I.

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

Sincerely,

/s/ Jennie B. Chandra

Jennie B. Chandra

cc: Michael Steffen  
Sharon Gillett  
Carol Matthey  
Joseph Cavender  
Paul de Sa  
Steven Rosenberg