

Tamara Preiss  
Vice President  
Federal Regulatory Affairs



February 16, 2012

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**Ex Parte**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: In the Matter of Connect America Fund A National Broadband Plan for Our Future High-Cost Universal Service Support, WC Docket No. 10-90; In the Matter of Federal -State Joint Board on Universal Service High-Cost Universal Service Support, WC Docket No. 05-337; Applications of Celco Partnership d/b/a Verizon Wireless and Atlantis Holdings LLC, for Consent to Transfer of Control of Licenses, Authorizations, and Spectrum Manager and De Facto Transfer Leasing Arrangements, WT Docket No. 08-95**

Dear Ms. Dortch:

On February 14, Chris Miller and Tamara Preiss of Verizon spoke by telephone with Austin Schlick, General Counsel of the FCC. We discussed the Commission's new rule phasing out legacy universal service high cost support to competitive eligible telecommunications carriers (CETCs)<sup>1</sup> and application of that rule to Verizon Wireless in light of Verizon's pre-existing Alltel merger commitment to phase out its CETC support over five years. We also discussed options for resolving Verizon's pending petition for clarification or, in the alternative, for reconsideration<sup>2</sup> and an opposition to Verizon's petition that was recently filed in this proceeding. We again discussed the appropriate treatment of Verizon Wireless and the need to ensure that, at a minimum, the company will receive high cost support sufficient to meet its ETC obligations in 2012. On February 15, Mr. Miller had a follow-up discussion with Mr. Schlick, and on February 16, Mr. Miller had an additional follow-up discussion with both Mr. Schlick and Trent Harkrader, Chief of the Telecommunications Access Policy Division, Wireline Competition Bureau. Mr. Miller discussed the same points in both follow-up conversations.

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<sup>1</sup> *Connect America Fund, et al.*, WC Docket No. 10-90 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (paras. 513-520) (rel. Nov. 18, 2011) ("*USF-ICC Transformation Order*").

<sup>2</sup> See *Verizon's Petition for Clarification or, in the Alternative, for Reconsideration*, WC Docket No. 10-90 *et al.*, at 3-6 (filed Dec. 29, 2011).

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This letter is being filed electronically pursuant to Section 1.1206 of the Commission's Rules. Should you have any questions, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "James L. Speer". The signature is written in a cursive style with a large initial "J" and a long, sweeping underline.

cc: (via e-mail)  
Austin Schlick  
Trent Harkrader