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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 16, 2012, Eric Einhorn and I met with Rebecca Goodheart, Victoria Goldberg, Randy Clarke, and Travis Littman in the Wireline Competition Bureau. Cesar Caballero and Kerry Smith from Windstream also joined the meeting by telephone.

Windstream reiterated its request that the FCC confirm that its comprehensive reform Order did not reduce originating access rates for toll traffic originating on the PSTN and terminating in IP format. The company observed that a contrary finding would be inconsistent with the consensus framework urged by members of the America's Broadband Connectivity Plan.<sup>1</sup> These discussions were consistent with the Petition for Reconsideration and/or Clarification that Windstream jointly filed with Frontier.<sup>2</sup>

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<sup>1</sup> See Joint Comments of AT&T, CenturyLink, Fairpoint, Frontier, Verizon, and Windstream (“Joint Comments”), Docket Nos. 10-90, *et al.*, at 22 (Aug. 24, 2011) (“The ABC Plan does not call for reductions in originating access charges, and the Commission should not undermine support for the Plan by altering this aspect of the carefully-negotiated compromise”); *id.* at 26-27 (noting that “[t]he ABC Plan does not call for reductions in originating access charges,” and “if the Commission *does* mandate such reductions, it will need to address rate rebalancing through potential end-user rate increases and additional recovery from the transitional access replacement mechanism”); *id.* at 26, n.85 (expressly finding that “[o]riginating intrastate dedicated transport

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

Sincerely,

/s/ Jennie B. Chandra

Jennie B. Chandra

cc: Rebecca Goodheart  
Victoria Goldberg  
Randy Clarke  
Travis Littman

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rates are the only exception...” to the ABC Plan signatories’ position that reductions to originating access rates should be avoided at this time). *See also* Connect America Fund *et al.*, Docket Nos. 10-90 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, at ¶ 1304, n.2352 (rel. Nov. 18, 2011) (recognizing that the ABC Plan signatories “urg[ed] the Commission not to undermine support for the ABC Plan by ordering reductions to originating access charges”).

<sup>2</sup> *See* Petition for Reconsideration and/or Clarification filed by Frontier Communications Corp. and Windstream Communications, Inc. (“Petition for Reconsideration”), WC Docket 10-90, *et al.*, (Dec. 29, 2011) at 21.