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February 28, 2012

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth 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. 03-109, WT Docket No. 10-208
Notice of *Ex Parte* Presentation**

Dear Ms. Dortch:

On February 24, 2012, Vincent Godinich of Nova Telephone Company (“Nova” or the “Company”), and Manny Staurulakis and John Kuykendall of John Staurulakis, Inc. (“JSI representatives”) met with Patrick Halley, Amy Bender and Alexander Minard of the Wireline Competition Bureau. The subject of discussion was the methodology for determining areas of overlap and the definition of “unsubsidized competitor” addressed in Section XVII.D of the Commission’s Order and Further Notice in the Universal Service Reform proceeding.¹ Attached is a map of Nova’s service territory which was provided to meeting participants. Comments in which Nova participated that set forth the Company’s position in this matter were also discussed.²

Mr. Godinich provided details of the local exchange and high speed Internet services provided by the Company as a longstanding incumbent local exchange carrier in the local communities in and around Nova, Ohio. Mr. Godinich and the JSI representatives discussed the need for modification of the Commission’s policies to eliminate support for areas with an unsubsidized competitor that offers voice and broadband service throughout an incumbent carrier’s study area.

¹ *Connect America Fund*, WC Docket No. 10-90, *A National Broadband Plan for Our Future*, GN Docket No. 09-51, *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135, *High-Cost Universal Service Support*, WC Docket No. 05-337, *Developing an Unified Inter-carrier Compensation Regime*, CC Docket No. 01-92, *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, *Lifeline and Link-Up*, WC Docket No. 03-109, *Universal Service Reform – Mobility Fund*, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (rel. Nov. 18, 2011) (“*Order and Further Notice*”).

² See Comments of Section D Rural Carriers, WC Docket No. 10-90 et al. filed Jan. 18, 2012.

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Please contact the undersigned with any questions.

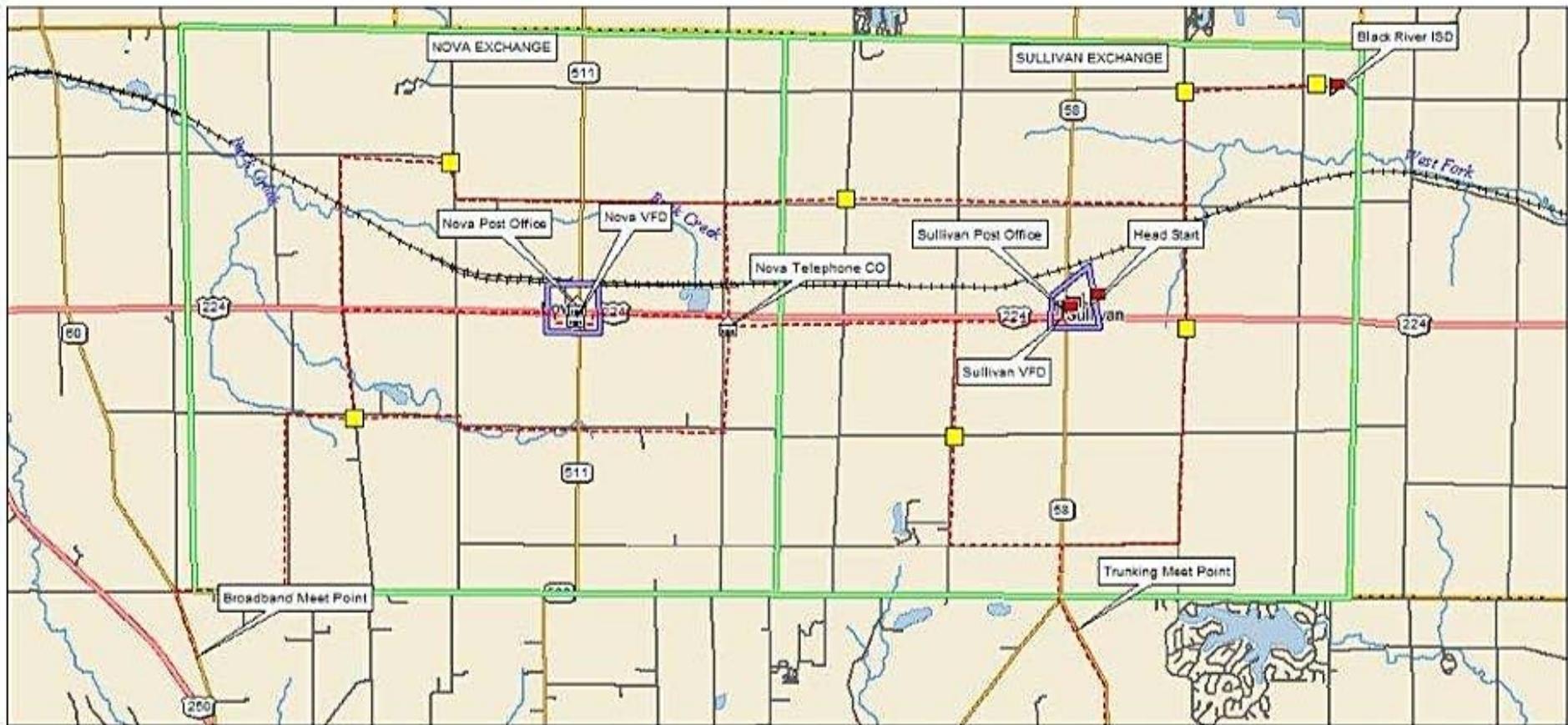
Respectfully submitted,

A handwritten signature in black ink, appearing to read "John Kuykendall". The signature is written in a cursive style with a large initial "J" and "K".

John Kuykendall
Vice President

cc: Patrick Halley
Amy Bender
Alexander Minard

Attachment



NOVA TELEPHONE COMPANY

64 SQUARE MILES

