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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 March 7, 2012, Michael Rhoda and I met with Zachary Katz, Chief of Staff to Chairman Genachowski, and Michael Steffen, Chief Counsel and Senior Legal Advisor to Chairman Genachowski. We called for the Commission to ensure that its near-term efforts to implement the comprehensive universal service and intercarrier compensation reform order will enable, rather than detract from, further broadband investment in rural areas. In particular, Windstream discussed its pending request for reconsideration of the “one unserved location per \$775” deployment requirement for Connect America Fund Phase I support.¹ Consistent with Windstream’s prior advocacy on this issue, we 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, we noted that consumers served by price cap carriers that have aggressively deployed broadband in rural areas – carriers like Windstream – may not be able to benefit from Phase I 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.

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

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

Sincerely,

/s/ Eric N. Einhorn

Eric N. Einhorn

cc: Zachary Katz
Michael Steffen