



Federal Communications Commission  
Washington, D.C. 20554

April 12, 2012

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: Connect America Fund, WC Docket No. 10-90; High-Cost Universal Service Support,  
WC Docket No. 05-337

Dear Ms. Dortch:

The *USF/ICC Transformation Order and FNPRM* comprehensively reformed and modernized the universal service and intercarrier compensation systems.<sup>1</sup> Among other things, the Commission established a transitional mechanism to distribute high-cost universal service support to price cap carriers, known as the Connect America Fund Phase I (CAF Phase I). In addition to freezing existing high-cost support for price cap carriers, the Commission adopted a process to distribute up to \$300 million of additional, incremental support among such carriers to spur the deployment of broadband to unserved areas.<sup>2</sup> The Commission delegated to the Wireline Competition Bureau (Bureau) the task of performing the calculations necessary to determine support amounts and selecting the necessary data.<sup>3</sup>

In an earlier Public Notice, the Bureau sought comment on wire center data submitted by Windstream Communications that the carrier proposed we used for CAF Phase I.<sup>4</sup> We also sought data for areas for which Windstream had not submitted data, and sought comment on alternate approaches to generating sufficiently reliable data.<sup>5</sup>

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<sup>1</sup> See *Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing an Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-Up, Universal Service Reform – Mobility Fund*, 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, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663 (2011) (*USF/ICC Transformation Order or Order*); *pets. for review pending sub nom. In re: FCC*, No. 11-9900 (10th Cir. filed Dec. 8, 2011).

<sup>2</sup> See *USF/ICC Transformation Order*, 26 FCC Rcd at 17715-17, paras. 133-38.

<sup>3</sup> *Id.* at 17716, para. 136. See also Wireline Competition Bureau Seeks Comment on Potential Data for Connect America Fund Phase I Incremental Support, WC Docket Nos. 10-90, 05-337, Public Notice, 27 FCC Rcd 981 (Wireline Comp. Bureau 2012) (*Phase I Data Sources PN*).

<sup>4</sup> See *Phase I Data Sources PN*, 27 FCC Rcd at 982; see also Letter from Jennie B. Chandra, Windstream Communications, Inc., to Marlene H. Dortch, Secretary, FCC, WC Docket No. 10-90 et al. (filed Jan. 20, 2012) (confidential filing of proposed data).

<sup>5</sup> See *Phase I Data Sources PN*, 27 FCC Rcd at 982.

In this letter, the Bureau provides the following list of readily available information it may consider as part of this proceeding.

1. GeoLytics 2011 population estimates, available at <http://www.geolytics.com/USCensus,Estimate-Projections,Categories.asp>.
2. United States Census, 2010 census block shapefiles, available at <http://www.census.gov/geo/www/tiger/tgrshp2010/tgrshp2010.html>.
3. United States Census, 2011 TIGER/line shapefiles for road data, available at <http://www.census.gov/geo/www/tiger/tgrshp2011/tgrshp2011.html>.
4. TomTom (formerly Tele Atlas North America), Wire Center Premium, for wire center boundary and central office location information, available at [http://www.tomtom.com/en\\_gb/licensing/industries/utilities-telecommunications/#tab:tab1](http://www.tomtom.com/en_gb/licensing/industries/utilities-telecommunications/#tab:tab1).
5. CostQuest Broadband Availability Tool reports for location count data, (*e.g.*, the SS20120215PublicFTTp\_CBG\_Detail download file), available, pursuant to the terms of the Second Supplemental Protective Order in WC Docket No. 10-90, DA 12-193 (released Feb. 10, 2012), at <https://reports.costquest.com/CQBAT/downloads.aspx>.

Sincerely,

Travis Litman  
Legal Counsel  
Wireline Competition Bureau