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April 19, 2012

**Ex Parte via Electronic Filing**

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

Re: *Universal Service Contribution Methodology*, WC Dkt. 06-122; *Connect America Fund*, WC Dkt. 10-90; *A National Broadband Plan for Our Future*, GN Dkt. 09-51; *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Dkt. 07-135; *High-Cost Universal Service Support*, WC Dkt. 05-337; *Developing a Unified Intercarrier Compensation Regime*, CC Dkt. 01-92; *Federal-State Joint Board on Universal Service*, CC Dkt. 96-45; *Lifeline and Link-Up*, WC Dkt. 03-109.

Dear Ms. Dortch:

On April 17, 2012, Adrienne T. Biddings, Telecom Policy Counsel with Google Inc. and the undersigned, of Lampert, O'Connor & Johnston, P.C., met with Christine Kurth, Policy Director and Wireline Counsel to Commissioner McDowell. Also, on April 18, 2012, the same parties met with Angela Kronenberg, Wireline Legal Advisor to Commissioner Clyburn. The universal service fund contribution mechanism was the topic of both meetings.

Google noted that there is wide support among stakeholders for a fresh examination of the current revenues-based universal service contribution system. Google strongly supports the Commission's goal, as set forth in the *USF/ICC Transformation Order*, of minimizing universal service contribution burdens on consumers and businesses.<sup>1</sup> To that end, Google urged the FCC to refresh the record on alternative contribution mechanisms, including in particular a connections/capacity-based mechanism, which Google believes would create a forward-looking approach to supporting the Connect America Fund and the remaining legacy universal service support mechanisms. We discussed the framework of such an approach, as described in the

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<sup>1</sup> *In the Matter of Connect America Fund, Report and Order and Further Notice of Proposed Rulemaking*, 2011 FCC LEXIS 4859, ¶ 57 (2011) ("*USF/ICC Transformation Order*").

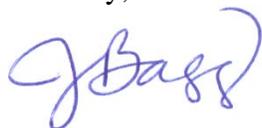
WC Dkt. 10-90, *et al.*

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August 18, 2011 *ex parte* letter submitted by supporters of the Tech/Users Framework.<sup>2</sup> Google also discussed its desire to craft a consensus-based, technology-neutral connections/capacity-based contribution mechanism that mirrors the shift of communications networks and services to broadband and IP, is equitable to all users of the public network (both residential and business), and that provides a stable and predictable mechanism for consumers and administrators of the funds.

Pursuant to the Commission's rules, this notice is being filed in the above-referenced dockets for inclusion in the public record. Please contact me directly should you have any questions.

Sincerely,



Jennifer P. Bagg  
*Counsel for Google Inc.*

cc: Angela Kronenberg  
Christine Kurth

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<sup>2</sup> See Letter from Ad Hoc Telecommunications Users, Google Inc., Skype Communications S.A.R.L., Sprint Nextel Corporation, and Vonage Holdings Corp., to Julius Genachowski, Chairman, FCC, *et al.*, WC Dkt. 10-90, *et al.* (filed Aug. 18, 2011).