



1634 Eye Street NW, Suite 510  
Washington, D.C. 20006

Jeffrey E. Dupree  
Vice President  
Government Relations  
PH 202-682-2495  
FX 202-682-0154  
[jdupree@neca.org](mailto:jdupree@neca.org)

April 25, 2012

***Ex Parte Notice***

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: ***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 a Unified Intercarrier Compensation Regime, CC Docket 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***

Dear Ms. Dortch:

On April 24, 2012, NECA representatives, Jim Frame, Victor Glass, Jennifer Leonard and the undersigned, met with Victoria Goldberg, Randy Clarke, Dan Ball, John Hunter, Doug Slotten, Dick Kwiatkowski, and Rhonda Lien of the Wireline Competition Bureau regarding the above-referenced matter. Ms. Leonard and Mr. Glass participated via telephone.

In the meeting we discussed implementation details related to the Commission's November 18, 2011 Order (Order) in the above-referenced proceeding. As a follow-up to our discussion from our April 18, 2012 meeting, we discussed the calculation of the composite rates to be used for the inter- and intrastate rate comparisons for the ICC rate transition. In particular, we addressed the specific revenues and demand units to be used for calculating both the intra- and interstate composite rates, as well as the aggregate interstate switched access data in the attachment. *Ex Parte* Letter from Jeffrey E. Dupree, Vice President-Government Relations, NECA, to Marlene H. Dortch, Secretary, FCC, WC Docket No 10-90, *et al.* (filed April 20, 2012).

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS with your office.

Sincerely,

A handwritten signature in black ink that reads "Jeffrey E. Dupree". The signature is written in a cursive style and is contained within a thin black rectangular border.

Attachment

cc: Victoria Goldberg  
Randy Clarke  
John Hunter  
Dan Ball  
Doug Slotten  
Dick Kwiatkowski  
Rhonda Lien

Interstate Switched Access Composite Rate Calculation  
(data in millions)

Ln	Item		Total Interstate Switched Access *		Terminating Interstate Switched Access **
1	Local Switching Minutes		7,692.396		4,461.590
2	Local Switching Rev		\$169.928		\$98.558
3	Information Surcharge		\$3.800		\$2.204
4	End Office	Ln 2+Ln 3	\$173.728		\$100.762
5	800 Database		\$5.053		\$0.000
6	Misc. and nonrecurring		\$1.136		\$0.659
7	Tandem Switched Transport		\$80.631		\$46.766
8	Dedicated Transport		\$19.429		\$19.429
9	Total Transport and Other	Sum Lns 5:8	\$106.250		\$66.854
10	Total Switched Access Revenue excluding LSS	Ln 4+Ln 9	\$279.977		\$167.616
11	Total Switched Access End Office Rate	Ln 4/Ln 1	\$0.0226		\$0.0226
12	Total Switched Access Transport Rate	Ln 9/Ln 1	\$0.0138		\$0.0150
13	Total Switched Access Composite Rate	Ln 10/Ln 1	\$0.0364		\$0.0376

14	Terminating Composite Relative to Overall Composite (data from Ln 13):				3.3%
15	Average terminating intrastate switched access rate:***				\$0.0609
16	Yr 1 Increment to Intrastate terminating rate using terminating interstate composite: (Ln 15 - Ln 13)/2				0.01165
17	Yr 1 Increment to Intrastate 7/1/2012 target using overall interstate composite: (Ln 15 - Ln 13)/2				0.01225
18	Intrastate 7/1/2012 target using terminating interstate composite: (Ln 15 - Ln 16)				\$0.0493
19	Intrastate 7/1/2012 target using overall interstate composite: (Ln 15 - Ln 17)				\$0.0487
20	Relative difference: (Ln 18/ Ln 19)-1				1.2%

\* Data from NECA's 2011 Annual Access Tariff Filing.

\*\* Terminating-to-Originating Factor = 58%; calculated using data from NECA Broadband Data Request

\*\*\* 2010 rate; calculated using data from NECA Broadband Data Request