

LAW OFFICES
BLOOSTON, MORDKOFKY, DICKENS, DUFFY & PRENDERGAST, LLP
2120 L STREET, NW, SUITE 300
WASHINGTON, DC 20037

HAROLD MORDKOFKY
BENJAMIN H. DICKENS, JR.
JOHN A. PRENDERGAST
GERARD J. DUFFY
RICHARD D. RUBINO
MARY J. SISAK
D. CARY MITCHELL
SALVATORE TAILLEFER, JR.

ARTHUR BLOOSTON
1914 - 1999

(202) 659-0830
FACSIMILE: (202) 828-5568

May 3, 2012

AFFILIATED SOUTH AMERICAN OFFICES

ESTUDIO JAUREGUI & ASSOCIATES
BUENOS AIRES, ARGENTINA

ROBERT M. JACKSON
OF COUNSEL

PERRY W. WOOFER
LEGISLATIVE CONSULTANT

EUGENE MALISZEWSKYJ
DIRECTOR OF ENGINEERING

WRITER'S CONTACT INFORMATION

(202) 828-5528
gjd@bloostonlaw.com

FILED VIA ECFS

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

**RE: WC Docket Nos. 10-90, 07-135, 05-337 and 03-109;
CC Docket Nos. 01-92 and 96-45;
GN Docket No. 09-51 and WT Docket No. 10-208**

Dear Ms. Dortch:

On May 3, 2012, the Wyoming Telecommunications Association ("WYTA") represented by Kelly Hoffman of All West Communications and the current President of the WYTA, Jason Hendricks of the Range Family of telecommunications companies, Kristin Lee and Terri Million of CenturyLink, and attorneys Liz Zerga and Gerry Duffy met via telephone conference with Carol Matthey, Amy Bender and Alex Minard of the Wireline Competition Bureau, to discuss various issues and solutions regarding the WYTA's December 29, 2011 petition for reconsideration of the pricing certification requirement in new Section 54.313(a)(10) of the Commission's Rules.

The WYTA representatives explained that Wyoming was an "early adopter" of intrastate access reform, but that its rebalancing of local service rates and its state universal service support mechanism had created a situation wherein many Wyoming incumbent local exchange carriers will be unable to comply both with Wyoming rate and universal service support requirements and with the Commission's Section 54.313(a)(10) pricing certification requirement. WYTA reiterated its request for amendment of Section 54.313(a)(10) to add an alternative certification option for local service rates approved or authorized by the state commission having jurisdiction over the carrier.

The Bureau representatives indicated their reluctance to amend Section 54.313(a)(10), and recommended instead that WYTA file a Section 1.3 petition for waiver of the certification requirement on behalf of its members.

Marlene H. Dortch, Secretary
May 3, 2012
Page 2 of 2

Pursuant to Section 1.1206(b) of the Commission's Rules, this submission is being filed for inclusion in the public record of the referenced proceedings.

Respectfully submitted,


Gerard J. Duffy

cc: Carol Matthey
Amy Bender
Alex Minard