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VIA ECFS

EX PARTE

May 24, 2012

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 Inter-carrier Compensation Regime; CC Docket No. 96-45, Federal State Joint Board on Universal Service; WC Docket No. 03-109, Lifeline and Link-Up*

Dear Ms. Dortch:

On May 23, 2012, Eric Einhorn, Cesar Caballero, Kerry Smith and I, from Windstream Communications, Inc. (“Windstream”) had a telephone conversation with Randy Clarke, Daniel Ball, Deena Shetler, and Doug Slotten of the Wireline Competition Bureau regarding the Commission’s rules for calculation of the Residential Rate Ceiling as part of implementation of access recovery charges (“ARCs”).

Windstream explained that it has the capability to assess ARCs on a wire center basis. While nearly all charges to be included in the Residential Rate Ceiling calculation do not vary across a wire center, E911 surcharges—which are usually assessed by county—can vary within a wire center where the wire center spans more than one county. Windstream advised that it does not have the billing system capability to address customers in that situation on a customer-by-customer basis. Rather, Windstream proposed using a weighted average of the E911 charge.

Please contact me if you have any questions or need more information.

Sincerely yours,

/s/ Malena F. Barzilai

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cc: Randy Clarke
Daniel Ball
Deena Shetler
Doug Slotten