



June 12, 2012

EX PARTE

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: WC Docket Nos. 05-25; 12-61; 10-90; and 05-337

Dear Ms. Dortch:

This is to inform you that on June 11, 2012, Walter McCormick, Jon Banks and the undersigned of USTelecom, met with Commissioner Ajit Pai, along with Matthew Berry and Gene Fullano of his staff.

During this meeting, USTelecom discussed the need for Commission policies that focus on eliminating barriers to industry investment in broadband facilities, in order to promote economic growth and job creation. In this context, we briefly described USTelecom's pending petition for forbearance from certain legacy regulations.

We also discussed the recent USF/ICC Transformation Order. In particular, we discussed the important link between inter-carrier compensation and universal service distribution reform and the need to ensure balanced and timely implementation of the Order. In addition, we discussed that the support provided by a reformed USF must clearly match with the network costs and regulatory obligations imposed on potential fund recipients and that realistic benchmarks must be established to ensure that USF support can be used to create new broadband infrastructure and bring new broadband subscribers online.

Finally, we discussed the Commission's on-going consideration of competition in the special access marketplace. We noted that the draft proposal appears to recommend substantive changes to the existing rules in the absence of any evidence of changed circumstances and in spite of the Commission's own acknowledgment that competitive providers' refusal to voluntarily submit data supporting their claims has been a primary obstacle to its evaluation of this issue. We explained that USTelecom has long supported a mandatory data request, and continues to do so. However, we argued that it would be inconsistent with principles of data-driven analysis for the Commission to change the rules mid-stream despite an acknowledged absence of data to support such change.

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Pursuant to Commission rules, please include this notice in the dockets identified above.

Sincerely,

A handwritten signature in black ink, appearing to read "Glenn T. Reynolds". The signature is written in a cursive style with a long, sweeping tail on the final letter.

Glenn T. Reynolds

c: Matthew Berry
Gene Fullano