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June 21, 2012

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

Re: WC Docket No. 09-197, Telecommunications Carriers Eligible to Receive Universal Service Support

Dear Ms. Dortch:

On behalf of NTCH, Inc., pursuant to Section 1.1206(b)(2) of the Commission's Rules, I am electronically filing this memorandum summarizing an oral *ex parte* presentation in the above-referenced docket.

On June 20, 2012, I spoke by telephone with Divya Shenoy of the Wireline Competition Bureau Telecommunications Access Policy Division. We discussed expanding NTCH's Lifeline program compliance showing in its pending petition for eligible telecommunications carrier (ETC), in accordance with the staff's implementation of the *Lifeline Order*, Docket 11-42, FCC 12-11 (rel. Feb. 2, 2012). In particular, I expressed the difficulty of generating a list of wire center CLLI codes and we discussed alternatives. We also discussed NTCH's training and customer intake processes as they relate to the Lifeline program.

Respectfully submitted,

Christine Goepf
Counsel for NTCH, Inc.