



June 21, 2012

By Electronic Filing

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

**RE: In the Matter of:**  
***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, WE Docket No. 05-337; Developing an Unified Intercarrier Compensation Regime, CC Docket No. 01-92; Federal-State Joint Board on Universal Service, CC Docket No. 96-45***

***Ex Parte Notice***

Dear Ms. Dortch:

On June 20, 2012, the undersigned met with Sharon Gillett, Chief, Wireline Competition Bureau, Amy Bender, Deputy Chief, Telecommunications Access Policy Division, Wireline Competition Bureau, and Patrick Halley, Legal Advisor, Wireline Competition Bureau, to discuss the above proceedings.

Our discussion revolved around the attached presentation materials, which highlight the following:

- A brief history of Blackfoot Telephone Cooperative, including our company's service area and network evolution;
- The detrimental impacts of "status quo" legacy Universal Service high cost loop funding as a result of the rapid escalation of the national average cost per loop;

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- The unfavorable economics of overbuilding our network with FTTH, despite urging by RUS to include such plans in our most recent loan application;
- The positive economic and policy ramifications of the current Transformation Order, including the positive impacts of the Order's caps; and
- Alternative service options for very high cost broadband deployment areas.

Sincerely,

\s\ William A. Squires  
William A. Squires  
Chief Executive Officer

cc: Sharon Gillett  
Amy Bender  
Patrick Halley