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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, GN Docket No. 09-51 and
CC Docket Nos. 01-92 and 96-45**

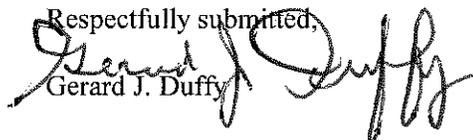
Dear Ms. Dortch:

On June 28, 2012, Robert DeBroux, Derrick Owens and Gerard Duffy representing the Western Telecommunications Alliance met with Michael Steffen, Legal Adviser to Chairman Julius Genachowski, and with Patrick Halley of the Wireline Competition Bureau, to discuss the various general long-term issues with respect to the Commission's pending further rulemaking proceeding regarding universal service and intercarrier compensation.

There was some general discussion regarding the sufficiency of the Commission's high-cost program budget for attaining increased broadband deployment, and regarding the unpredictable elements of the quantile regression model and their impacts upon rural telephone company investment projects and financing options. The major portion of the meeting involved a general discussion of the advantages and disadvantages of: (a) the Commission proceeding rapidly to adopt orders with respect to the pending matters in the further rulemaking that affect rural telephone companies; or (b) waiting to monitor the impacts of its implemented changes before proceeding further. A hybrid approach of resolving certain critical issues at an early date (e.g., support for naked digital subscriber line services), while monitoring impacts before proceeding on others was also discussed. Finally, there was some general discussion as to the role of the Commission, state commissions, rural telephone companies and other interested industry segments in devising potential solutions to outstanding issues.

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: Michael Steffen
Patrick Halley