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August 21, 2012

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Filed Via ECFS

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 August 20, 2012, Robert DeBroux, Derrick Owens and Gerard Duffy representing the Western Telecommunications Alliance ("WTA") met by telephone with Christine D. Kurth, Policy Director and Wireline Counsel to Commissioner Robert M. McDowell, to discuss various universal service and intercarrier compensation issues relating to the referenced proceedings.

The WTA representatives reiterated concerns with the lack of predictability of the Quantile Regression Analysis model benchmarks, and their adverse impacts upon present and future broadband investment by rural local exchange carriers ("RLECs"). Most of the discussion focused upon near-term and longer-term efforts going forward to develop approaches that will satisfy Commission budgetary and cost control goals while providing predictable financial conditions and effective investment incentives for RLECs to deploy the broadband upgrades desired by their customers.

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: Christine D. Kurth