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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:

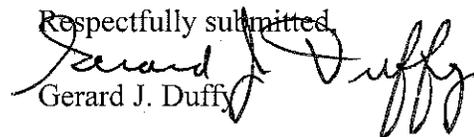
On November 1, 2012, Robert DeBroux (by telephone), Derrick Owens and Gerard Duffy representing the Western Telecommunications Alliance ("WTA") met with Priscilla Delgado Argeris, Legal Adviser to Commissioner Jessica Rosenworcel.

The discussion focused generally upon potential adjustments to the substantive features and implementation schedules of various portions of the Commission's universal service and intercarrier compensation reforms, particularly the Quantile Regression Analysis ("QRA") benchmarks. The possible changes mentioned included: combining the capital expenditure and operating expense models or benchmarks; extending or increasing QRA transition periods; freezing QRA benchmarks for several years; modifying High Cost Loop Support recycling procedures; and addressing procedures or schedules for consideration of additional pending rulemaking proposals. WTA expressed its support for these changes and emphasized the importance of Commission action at an early date in order to reduce the uncertainty that is impeding the budgetary and infrastructure investment planning of its rural telephone company members.

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: Priscilla Delgado Argeris