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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 7, 2012, Robert DeBroux, 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. The specific matters addressed included: waiver standards, financial reporting obligations, combining the capital expenditure and operating expense benchmarks of the Quantile Regression Analysis ("QRA"); QRA implementation and transition periods; freezing and predictability of periodic QRA benchmarks; High Cost Loop Support recycling procedures; and preconditions and procedures for consideration of additional pending rulemaking proposals.

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