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FILED VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
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RE: WC Docket Nos. 10-90, 07-135, 05-337 and 03-109; CC Docket Nos. 01-92 and 96-45; and GN Docket No. 09-51 and WT Docket No. 10-208

Dear Ms. Dortch:

On December 5, 2012, Paul Kelly of Cordova Telephone Cooperative, Inc.; Doug Neal of OTZ Telephone Cooperative, Inc.; and Derrick Owens and Gerard Duffy representing the Western Telecommunications Alliance met with Priscilla Delgado Argeris, Legal Adviser to Commissioner Jessica Rosenworcel, to discuss various universal service fund ("USF") and intercarrier compensation ("ICC") matters affecting Alaskan rural telephone companies and their customers.

The discussion focused upon the need for specific support mechanisms or long-term exemptions to address the unique circumstances of Alaska. Topics included: (1) the high costs of constructing, maintaining and operating wireline and wireless telecommunications networks in the harsh climate and sparsely populated areas of Alaska; (2) the reliance by some Alaskan rural telephone companies upon USF and ICC for as much as 80-to-84 percent of their revenue streams; (3) the immediate dangers to the financial viability of Alaskan rural telephone companies from the scheduled 5 percent per year reductions in eligible recovery for ICC (which comprises the major portion – often more than 60 percent -- of the total USF and ICC revenues of such companies); (4) the unpredictability of future USF support due to regression model uncertainties; (5) the manner in which the scheduled ICC revenue reductions and unpredictable future USF support have deterred investment projects and hiring by Alaskan rural telephone companies; and (6) the likelihood of significant service losses and public safety hazards if Alaskan rural telephone companies lose their ability to sustain operations in areas that no other carriers have ever shown a substantial desire to serve.

Marlene H. Dortch, Secretary
December 6, 2012
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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