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December 7, 2012

**Ex Parte**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**RE: Universal Service Contribution Methodology, WC Docket No. 06-122**

Dear Ms. Dortch:

On December 6, 2012, Chris Miller and the undersigned of Verizon met with Priscilla Delgado Argeris, Legal Advisor to Commissioner Rosenworcel, regarding the above-captioned proceeding.

In the meeting, Verizon again urged the Commission to reverse the *Bureau Order* that established a one-year limit on a contributor's ability to re-file its Form 499 to revise its revenues downward and, thereby, reduce its required contributions to the Universal Service Fund ("USF").<sup>[1]</sup> The one-year deadline set in the *Bureau Order* should have been – but was not – the subject of a notice-and-comment rulemaking prior to being adopted and, in any event, was beyond the Wireline Competition Bureau's delegated authority.

We also discussed the lack of a Commission rule or order addressing a limitations period to re-file in a situation where a carrier's contributions would increase. Verizon discussed the October 25, 2012 "white paper" it filed regarding this issue.

This letter is being filed electronically pursuant to Section 1.1206 of the Commission's rules. Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Alan Buzacott".

cc: Priscilla Delgado Argeris (via e-mail)

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<sup>[1]</sup> *Federal-State Joint Board on Universal Service*, et al., 20 FCC Rcd 1012 (WCB 2004) ("*Bureau Order*").