

Alan Buzacott
Executive Director
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February 14, 2013

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Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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

Dear Ms. Dortch:

On February 12, 2013, Jeff Lanning of CenturyLink, Cathy Carpino of AT&T, Sheba Chacko of BT, Tiki Gaugler and Lisa Youngers of XO Communications, and David Haga and the undersigned of Verizon met in person with Carol Matthey, Vickie Robinson, Carol Pomponio, Charles Eberle, Nakesha Woodward, and Erica Myers and with Claudia Fox attending via telephone, all of the Wireline Competition Bureau, to discuss the Bureau's proposed changes to the FCC Form 499-A and accompanying instructions.¹

In the meeting, we explained that model certification language proposed by the Bureau in the *Public Notice* is unclear, inconsistent with the *2012 Wholesaler-Reseller Clarification Order*,² and burdensome to implement. For those reasons, and because new model certification language is not necessary for the reporting of 2012 revenues, we recommended that the Bureau not add the proposed model certification language to the 2013 Form 499-A instructions. We urged the Bureau to instead work with carriers to develop alternative model reseller certification language that is consistent with the *2012 Wholesaler-Reseller Clarification Order* and could be effectively implemented by carriers.

¹ *Wireline Competition Bureau Seeks Comment on Proposed Changes to FCC Form 499-A, FCC Form 499-Q, and Accompanying Instructions*, WC Docket No. 06-122, Public Notice, DA 12-1872 (rel. November 23, 2012) (*Public Notice*).

² *Universal Service Contribution Methodology*, Order, 27 FCC Rcd 13780 (2012) (“*2012 Wholesaler-Reseller Clarification Order*”).

Marlene H. Dortch

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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,

/s/ Alan Buzacott

cc: Carol Matthey
Vickie Robinson
Carol Pomponio
Charles Eberle
Nakesha Woodward
Erica Myers
Claudia Fox