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VIA ECFS

EX PARTE

February 19, 2013

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

Re: *WC Docket No. 11-10, Modernizing the FCC Form 477 Data Program; WC Docket No. 07-38, Development of Nationwide Broadband Data to Evaluate Reasonable and Timely Deployment of Advanced Services to All Americans*

Dear Ms. Dortch:

On February 15, 2013, Tim Loken and I, from Windstream Corporation (“Windstream”), spoke by telephone with Chelsea Fallon, Lisa Gelb, Travis Litman, Ken Lynch, Carol Simpson and Rodger Woock of the Wireline Competition Bureau and Susan Singer and Mitali Shah of the Wireless Telecommunications Bureau regarding the above-referenced proceeding. The Commission representatives briefed the Windstream participants on potential changes in the Form 477 data collection process, including requiring reporting of subscription data at the census block level and adding the collection of deployment data.

With regard to subscription data, Windstream urged that the Commission should continue its practice of aggregating filed data in published documents in a way that does not identify company-specific information. The Commission representatives also mentioned a proposed “client-side app” that would help assist carriers with geocoding and geolocating. The Windstream representatives noted that such an application, designed properly, could be a useful option for some carriers, but expressed concerns about the dependability of a web-based platform under real-world conditions.

Regarding the collection of deployment data, Windstream suggested that the Commission should reduce the number of speed tier categories and align them with speed requirements set forth in Commission policy. For example, to the extent the Commission is requiring Connect America Fund recipients to build out to 4 Mbps download/1 Mbps upload, and excluding areas for CAF support based on the presence of 4/1 service from an unsubsidized competitor, it would make sense for the Commission to collect data on the actual availability of 4/1 service.

Please feel free contact me if you have any questions.

Sincerely yours,

/s/ Malena F. Barzilai

Malena F. Barzilai

cc: Chelsea Fallon
Lisa Gelb
Travis Litman
Ken Lynch
Mitali Shah
Carol Simpson
Susan Singer
Rodger Woock