



February 25, 2013

EX PARTE

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

Re: Connect America Fund, WC Docket No. 10-90;
High-Cost Universal Service Support, WC Docket No. 05-337

Dear Ms. Dortch:

On Thursday, February 21, 2013, Jon Banks of USTelecom, Malena Barzalai and Bill Kreutz of Windstream, Maggie McCready of Verizon, Jeff Lanning and Richard Rouselot of CenturyLink, and Vonda Long, Mary Henze, Lesa Bunting (via phone), and Lenny Glynn (via phone) of AT&T, met with Rodger Woock, Ryan Yates, Steve Rosenberg, Suzanne Mendez, Chelsea Fallon, Suzanne Yelen, and John Emmett, of the FCC, to discuss the Report and Order adopted by the Wireline Competition Bureau in the dockets identified above on November 6, 2012. That Order adopted data specifications for collecting study area and exchange area boundaries from carriers to be used in implementing certain universal service reforms set out in the Commission's *USF/ICC Transformation Order*.

We outlined the broad range of mapping data currently in the possession of price cap carriers, which is one group of carriers subject to the Order. Many study area and exchange area boundaries are recorded only on paper maps. Updating these paper maps to reflect changes over time and then digitizing them is a substantial challenge. While a large group of study and exchange areas are mapped in digital format, insuring that these are properly updated to reflect boundary area changes is labor intensive and time consuming. In addition, at least some of the areas that are digitally mapped are mapped to unique land mass databases that may not match standard databases. Because there are thousands more exchange areas than study areas, providing detailed mapping information on exchange areas substantially increases the difficulty, time, and expense of providing information at the detailed level set out in the Order. In addition, we discussed the difficulty of certifying to boundaries at a minimum horizontal accuracy of plus or minus forth feet as set out in the Order. We also noted that there are existing boundary disputes that affect mapping and certification, and that state commissions control final resolution of where boundaries are located.

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Pursuant to Commission rules, please include a copy of this notice in each of the above-identified proceedings.

Sincerely,

A handwritten signature in cursive script that reads "Jonathan Banks".

Jonathan Banks
Senior Vice President, Law & Policy

c: John Emmett
Chelsea Fallon
Suzanne Mendez
Steve Rosenberg
Rodger Woock
Ryan Yates
Suzanne Yelen