

Malena F. Barzilai  
Senior Counsel, Government Affairs  
Windstream Corporation  
1101 17<sup>th</sup> Street, N.W., Suite 802  
Washington, DC 20036

(202) 223-4276  
malena.barzilai@windstream.com



**VIA ECFS**

***EX PARTE***

March 7, 2013

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

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

Dear Ms. Dortch:

On March 4, 2013, Eric Einhorn and I, from Windstream Corporation (“Windstream”), spoke on the telephone with Michael Steffen, Legal Advisor to Chairman Julius Genachowski, about potential modifications to the Connect America Fund (“CAF”) Phase I program.

Windstream urged the Commission to adopt the proposals for modification of CAF Phase I that were raised in the Further Notice of Proposed Rulemaking<sup>1</sup> and advocated in joint comments submitted by USTelecom, ITTA, and the ABC Coalition.<sup>2</sup> Consistent with its prior advocacy, Windstream reiterated its support for the expansion of eligibility to all locations that lack broadband service meeting the Commission’s CAF buildout standard of 4 Mbps downstream and 1 Mbps upstream. Windstream reiterated that using National Broadband Map evidence of 3 Mbps/768 kbps service as a proxy for the presence of 4/1 service would exclude

---

<sup>1</sup> See *Connect America Fund*, Further Notice of Proposed Rulemaking, WC Docket No. 10-90, FCC 12-138, ¶¶ 7 (rel. Nov. 19, 2012) (“*FNRPM*”).

<sup>2</sup> See Comments of the United States Telecom Association, Independent Telephone & Telecommunications Alliance, and the ABC Coalition, WC Docket Nos. 10-90, 05-337 (filed Jan. 28, 2013); Reply Comments of the United States Telecom Association, the Independent Telephone & Telecommunications Alliance, and the ABC Coalition, WC Docket Nos. 10-90, 05-337 (filed Feb. 11, 2013).

from eligibility many locations that actually lack 4/1 service, and thus likely would reduce dramatically the efficacy of a new round of CAF Phase I.<sup>3</sup>

Please feel free contact me if you have any questions.

Sincerely yours,

/s/ Malena F. Barzilai

Malena F. Barzilai

cc: Michael Steffen

---

<sup>3</sup> See *id.* at 10-11. See also Comments of Windstream Corporation, WC Docket No. 10-90 (Jan. 9, 2013); Comments of the United States Telecom Association, WC Docket No. 10-90 (Jan. 9, 2013).