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VIA ECFS

EX PARTE

March 15, 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 13, 2013, Jeffery Gardner and Eric Einhorn, respectively the CEO and Senior Vice President, Government Affairs, of Windstream Corporation (“Windstream”), met with Chairman Julius Genachowski and his chief of staff, Zachary Katz, and legal advisor, Michael Steffen, about potential modifications to the Connect America Fund (“CAF”) Phase I program.

Windstream emphasized that doing another round of CAF Phase I, rather than adding remaining incremental support to CAF Phase II, would best advance the Commission’s “interest in disbursing the available funds to bring robust broadband-capable networks to consumers and businesses as soon as possible.”¹ Windstream also urged the Commission to adopt the proposals for modification of CAF Phase I that were raised in the Further Notice of Proposed Rulemaking² and advocated in joint comments submitted by USTelecom, ITTA, and the ABC Coalition.³

In particular, Windstream advocated that the Commission should permit price cap carriers to satisfy their buildout obligations with second-mile fiber deployments to upgrade

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

² See *id.*

³ 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).

Digital Subscriber Line Access Multiplexers (DSLAMs) that are currently served by copper. Windstream discussed how the Commission could address any overbuilding concerns by only providing per-mile fiber funding for the portions of fiber deployments that do not overlap areas served by cable. Windstream also emphasized the need to ensure that only those areas that actually are served by 4/1 Mbps broadband—by an incumbent local exchange carrier and/or an unsubsidized competitor—are excluded from eligibility for CAF Phase I support.

If the Commission adopts the modifications suggested in the joint comments, Windstream would expect to be able to bring 4/1 broadband service to at least 100,000 locations that lack it today.

Please feel free contact me if you have any questions.

Sincerely yours,

/s/ Malena F. Barzilai

Malena F. Barzilai

cc: Chairman Julius Genachowski
Zachary Katz
Michael Steffen