



April 15, 2013

Ex Parte

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

Re: Connect America Fund, WC Docket No. 10-90; Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92

Dear Ms. Dortch:

On Wednesday, April 10, 2013, Maggie McCreedy (Verizon), Mike Skrivan and Karen Brinkmann (FairPoint), Jeff Lanning (CenturyLink), Mary Henze (AT&T), Malena Barzilai (Windstream) and I met with Michael Jacobs, Christopher Cook, Alexander Minard, Lynne Engledow, Douglas Sloten, Jamie Susskind, Deena Shetler and Carol Matthey of the FCC's Wireline Competition Bureau.

We discussed the table titled "Further Revised Impact of Broadband Requirement on Frozen Legacy Support" attached to the March 28, 2013 ex parte that I filed in this docket. We further focused on exploring the tension between language in the *USF/ICC Transformation Order* and rules that, on one hand, appear to direct companies to allocate certain legacy high-cost support (IAS, ICLS and LSS) to the calculation of interstate access charges¹ but, on the other hand, also appear to direct companies to spend increasingly larger amounts of this same legacy high-cost support on building and operating broadband networks in certain areas.² We have discussed this issue in further detail in earlier ex partes.³

Pursuant to Commission rules, please include this ex parte letter in the above-identified proceedings.

¹ Connect America Fund, et al., WC Docket No. 10-90, et al., 26 FCC Rcd 17663, ¶ 152 (2011) (USF/ICC Transformation Order); 47 C.F.R. § 54.312(a)(3).

² 47 C.F.R. § 54.313(c)(2)-(4).

³ See, e.g., Letter from Jonathan Banks, USTelecom, to Marlene Dortch, FCC, WC Docket No. 10-90 and CC Docket No. 01-92 (filed Feb. 27, 2013); Letter from David Cohen, USTelecom, to Marlene Dortch, FCC, WC Docket No. 10-90 (filed Jan. 31, 2013); Letter from Jonathan Banks, USTelecom, to Marlene Dortch, FCC, WC Docket No. 10-90 (filed Dec. 20, 2012).

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If you have any questions, please contact me.

Sincerely,

A handwritten signature in blue ink that reads "Jonathan Banks". The signature is fluid and cursive, with the first name "Jonathan" and the last name "Banks" clearly legible.

Jonathan Banks
Senior Vice President, Law & Policy

c: Michael Jacobs
Christopher Cook
Alexander Minard
Lynne Engledow
Douglas Slotten
Jamie Susskind
Deena Shetler
Carol Matthey