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June 20, 2013

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *Modernizing the FCC Form 477 Data Program, WC Docket No. 11-10; Development of Nationwide Broadband Data to Evaluate Reasonable and Timely Deployment of Advanced Services to All Americans, Improvement of Wireless Broadband Subscriber Data, and Development of Data on Interconnected Voice over Internet Protocol (VoIP) Subscriber Data, WC Docket No. 07-38; Service Quality, Customer Satisfaction, Infrastructure and Operating Data Gathering, WC Docket No. 08-190; Review of Wireline Competition Bureau Data Practices, WC Docket No. 10-132*

Dear Ms. Dortch:

On June 19, 2013, the undersigned, Marty Klueh and Dave Cavaliere of JSI participated in a teleconference with Jamie Susskind, Lisa Gelb, Steven Rosenberg, Rodger Woock and Chelsea Fallon of the FCC's Wireline Competition Bureau, and Susan Singer of the Wireless Telecommunications Bureau. The subject of discussion was the proposed changes to the FCC Form 477.

Bureau staff provided an overview of staff recommendations for FCC Form 477 revisions. Call participants discussed the submission of broadband deployment data already collected by NTIA in a standardized format. Although staff recommendations do not presently include the more granular subscriber reporting at the census block level, JSI cautioned that a future decision to do so would present difficulties for carriers in the most rural areas. JSI also underscored the limited staff resources available to small rural carriers and the importance of allowing adequate time for these carriers to prepare for revised reporting and billing system adjustments.

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Please contact the undersigned with any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John Kuykendall". The signature is written in a cursive, flowing style.

John Kuykendall
Vice President

cc: Jamie Susskind
Lisa Gelb
Steven Rosenberg
Rodger Woock
Chelsea Fallon
Susan Singer