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May 19, 2010

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Filed Via ECFS

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

WRITER'S CONTACT INFORMATION

(202) 828-5528
gjd@bloostonlaw.com

RE: WC Docket Nos. 10-90 and 05-337 and GN Docket No. 09-51

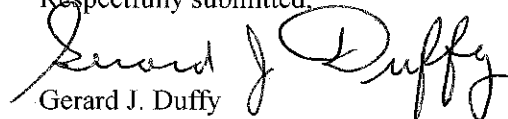
Dear Ms. Dortch:

On May 18, 2010, Bob DeBroux, Mark Gailey, Roger Nishi, John Rose, Derrick Owens, Stuart Polikoff and Gerry Duffy representing the Organization for the Promotion and Advancement of Small Telecommunications Companies ("OPASTCO") and the Western Telecommunications Alliance ("WTA") met with Christi Shewman, Legal Advisor for Wireline and Universal Service to Commissioner Meredith Attwell Baker, to discuss broadband and universal service matters relating to the pending Notice of Inquiry and Notice of Proposed Rulemaking, FCC 10-58, released April 21, 2010 in the referenced dockets.

The topics included: (a) the major success of Universal Service Fund ("USF") and intercarrier compensation mechanisms in enabling rural telephone companies to invest in and operate quality voice and broadband-capable facilities to serve their rural customers; (b) the likelihood that a "4 Mbps downstream, 1 Mbps upstream" broadband service capacity target will be insufficient in many rural areas long before 2020, and will produce substantial rural-urban service disparities that will become permanent without expensive regulatory, network and technology re-designs; (c) the current reliance by rural telephone companies upon USF support and intercarrier compensation for a critical 60-to-80 percent of the revenue streams needed to operate their networks and repay their outstanding loans; (d) the concerns that the Commission's universal service proposals and rulemaking schedules will result in crippling reductions of USF support and intercarrier compensation for many rural telephone companies; and (e) the adverse impacts of the Commission's proposals and associated uncertainties that are already being felt upon the incentives and abilities of rural telephone companies to invest in network upgrades as well as upon the availability of the bank loans necessary to do so.

Pursuant to Section 1.1206(b) of the Commission's Rules, this submission is being filed for inclusion in the public record of the referenced proceedings.

Respectfully submitted,


Gerard J. Duffy

cc: Christi Shewman

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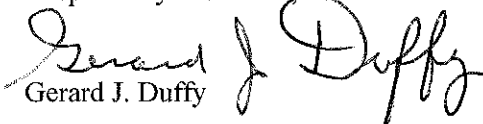
Dear Ms. Dortch:

On May 18, 2010, Bob DeBroux, Mark Gailey, Roger Nishi, John Rose, Derrick Owens, Stuart Polikoff and Gerry Duffy representing the Organization for the Promotion and Advancement of Small Telecommunications Companies ("OPASTCO") and the Western Telecommunications Alliance ("WTA") met with Jennifer Schneider, Senior Policy Advisor and Legal Advisor for Broadband, Wireline and Universal Service Issues to Commissioner Michael J. Copps, to discuss broadband and universal service matters relating to the pending Notice of Inquiry and Notice of Proposed Rulemaking, FCC 10-58, released April 21, 2010 in the referenced dockets.

The topics included: (a) the major success of Universal Service Fund ("USF") and intercarrier compensation mechanisms in enabling rural telephone companies to invest in and operate quality voice and broadband-capable facilities to serve their rural customers; (b) the likelihood that a "4 Mbps downstream, 1 Mbps upstream" broadband service capacity target will be insufficient in many rural areas long before 2020, and will produce substantial rural-urban service disparities that will become permanent without expensive regulatory, network and technology re-designs; (c) the current reliance by rural telephone companies upon USF support and intercarrier compensation for a critical 60-to-80 percent of the revenue streams needed to operate their networks and repay their outstanding loans; (d) the concerns that the Commission's universal service proposals and rulemaking schedules will result in crippling reductions of USF support and intercarrier compensation for many rural telephone companies; and (e) the adverse impacts of the Commission's proposals and associated uncertainties that are already being felt upon the incentives and abilities of rural telephone companies to invest in network upgrades as well as upon the availability of the bank loans necessary to do so.

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cc: Jennifer Schneider

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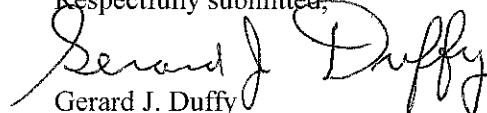
Dear Ms. Dortch:

On May 18, 2010, Bob DeBroux, Mark Gailey, Roger Nishi, John Rose, Derrick Owens, Stuart Polikoff and Gerry Duffy representing the Organization for the Promotion and Advancement of Small Telecommunications Companies ("OPASTCO") and the Western Telecommunications Alliance ("WTA") met with Angela Kronenberg, Acting Legal Advisor, Wireline to Commissioner Mignon Clyburn, to discuss broadband and universal service matters relating to the pending Notice of Inquiry and Notice of Proposed Rulemaking, FCC 10-58, released April 21, 2010 in the referenced dockets.

The topics included: (a) the major success of Universal Service Fund ("USF") and intercarrier compensation mechanisms in enabling rural telephone companies to invest in and operate quality voice and broadband-capable facilities to serve their rural customers; (b) the likelihood that a "4 Mbps downstream, 1 Mbps upstream" broadband service capacity target will be insufficient in many rural areas long before 2020, and will produce substantial rural-urban service disparities that will become permanent without expensive regulatory, network and technology re-designs; (c) the current reliance by rural telephone companies upon USF support and intercarrier compensation for a critical 60-to-80 percent of the revenue streams needed to operate their networks and repay their outstanding loans; (d) the concerns that the Commission's universal service proposals and rulemaking schedules will result in crippling reductions of USF support and intercarrier compensation for many rural telephone companies; and (e) the adverse impacts of the Commission's proposals and associated uncertainties that are already being felt upon the incentives and abilities of rural telephone companies to invest in network upgrades as well as upon the availability of the bank loans necessary to do so.

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cc: Angela Kronenberg

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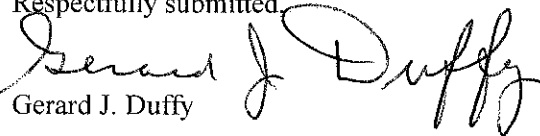
Dear Ms. Dortch:

On May 18, 2010, Bob DeBroux, Mark Gailey, Roger Nishi, Keith Oliver, Ben Spearman, Paul Cooper, John Rose, Derrick Owens, Stuart Polikoff and Gerry Duffy representing the Organization for the Promotion and Advancement of Small Telecommunications Companies (“OPASTCO”) and the Western Telecommunications Alliance (“WTA”) met with Sharon Gillett, Carol Matthey, Rebekah Goodheart, John Hunter, Alexander Minard, Al Lewis, Marcus Maher, Katie King, Gary Seigel, Amy Bender and Pam Arluk of the Wireline Competition Bureau, as well as with Priya Aiyar, Legal Advisor for Wireline Competition and International Issues to Chairman Julius Genachowski, to discuss rural telephone company concerns with the pending Notice of Inquiry and Notice of Proposed Rulemaking, FCC 10-58, released April 21, 2010, in the referenced dockets.

The topics included: (a) the great success of Rate of Return regulation and Universal Service Fund (“USF”) and intercarrier compensation mechanisms in enabling rural telephone companies to invest in and operate quality voice and broadband-capable facilities to serve their rural customers; (b) the current reliance by rural telephone companies upon USF support and intercarrier compensation for a critical 60-to-80 percent of the revenue streams needed to operate their networks and repay their outstanding loans; (c) the concerns that the Commission’s universal service proposals and rulemaking schedules will result in crippling reductions of USF support and intercarrier compensation for many rural telephone companies that will not only stop their progress in deploying broadband-capable facilities but also threaten the viability of their existing broadband services; (d) the adverse impacts of the Commission’s proposals and associated uncertainties that are already being felt upon the incentives and abilities of rural telephone companies to continue to invest in network upgrades as well as upon the availability of the bank loans necessary to do so; (e) the very different infrastructure investment incentives, financial resources and universal service support needs of rural telephone companies vis-à-vis larger carriers; and (f) the likelihood that a “4 Mbps downstream, 1 Mbps upstream” broadband service capacity target will be insufficient in many rural areas long before 2020, and will produce rural-urban service disparities that will become permanent without substantial and expensive network and technology re-designs.

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Page 2 of 2

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Gerard J. Duffy

cc: Priya Aiyar
Sharon Gillett
Carol Matthey
Rebekah Goodheart
John Hunter
Alexander Minard
Al Lewis
Marcus Maher
Katie King
Gary Seigel
Amy Bender
Pam Arluk