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September 2, 2010

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

Re: A National Broadband Plan for Our Future, GN Docket No. 09-51

Dear Ms. Dortch:

On September 2, 2010 representatives of rural rate-of-return incumbent local exchange carriers met with staff from the Wireline Competition Bureau (WCB) to discuss issues regarding potential reform of intercarrier compensation (ICC) mechanisms. WCB representatives included John Hunter, Don Stockdale, Randy Clarke, Amy Bender, Lynne Engledow, Doug Slotten, Al Lewis, Katie King, Marcus Maher, Jay Atkinson, and Dan Ball. RLEC representatives included Stuart Polikoff, Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO); Paul Cooper, the Rural Alliance; Derrick Owens, Western Telecommunications Alliance (WTA) and Gerry Duffy, of counsel representing WTA; Mike Romano and Jill Canfield, National Telecommunications Cooperative Association (NTCA); and the undersigned.

RLEC representatives suggested the Commission should take certain near-term steps on the way to comprehensive reform. They include: immediately clarify that all providers using the PSTN to originate and/or terminate calls must pay the applicable intercarrier compensation rates, regardless of technology; immediately strengthen call signaling rules to address "phantom traffic"; cap interstate access rates at their existing levels for all RoR-regulated carriers and permit any interstate access revenue requirement shortfall to be recovered from federal universal service support; give each RoR carrier the option to unify its intrastate access rates with the capped interstate rates and permit carriers to recover the resulting reductions in ICC through a combination of reasonable end-user rates and incremental federal universal service support.

Questions regarding this meeting may be directed to my attention.

Sincerely,

A handwritten signature in black ink that reads "Joe A. Douglas". The signature is written in a cursive, flowing style.

cc: Jay Atkinson
Dan Ball
Amy Bender
Randy Clarke
Lynne Engledow
John Hunter
Katie King
Al Lewis
Marcus Maher
Doug Slotten
Don Stockdale