



INDIANA TELECOMMUNICATIONS ASSOCIATION, INC.

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August 24, 2011

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

Re: Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92; High-Cost Universal Service Support, WC Docket No. 05-337; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; Connect America Fund, WC Docket No. 10-90; A National Broadband Plan for Our Future, GN Docket No. 09-51; Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Lifeline and Link-Up, WC Docket No. 03-109; Universal Service Contribution Methodology, WC Docket No. 06-122; Numbering Resource Optimization, CC Docket No. 99-200; Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98; Intercarrier Compensation for ISP-Bound Traffic, CC Docket No. 99-68; IP-Enabled Services, WC Docket No. 04-36


Dear Ms. Dortch:

The Indiana Telecommunications Association writes in support of the Consensus Framework as described in the cover letter signed by Jonathan Banks from the United States Telecom Association and letter to the Federal Communications Commissioners dated July 29, 2011 and co-signed by Robert W. Quinn, Jr. for AT&T, Melissa Newman for CenturyLink, Michael T. Skrivan for Fairpoint Communications, Kathleen Q. Abernathy for Frontier, Kathleen Grillo for Verizon, Michael D. Rhoda for Windstream, John Rose for the Organization for the Promotion and Advancement of Small Telecommunications Companies, Shirley Bloomfield for the National Telecommunications Cooperatives Association, Walter B. McCormick for the United States Telecom Association and Kelly Worthington for the Western Telecommunications Alliance. This Consensus Framework represents an important balance of interests that will further the deployment and maintenance of broadband and broadband-capable networks across the State of Indiana and the United States of America.

In this regard, the Indiana Telecommunications Association urges the Commission to refrain from modifying this carefully crafted Consensus Framework created by the signees which has been designed to meet specific broadband deployment objectives. Adjustments to the Consensus Framework that affect the interests of the parties adversely could undermine the overall effectiveness of the Consensus Framework, thereby eliminating not only industry confidence in an acceptable reform solution, but also investor confidence that enables the injection of necessary private capital to support networks where no business case can be made.

The Indiana Telecommunications Association is a 114 year old industry trade association representing 41 telecommunications companies serving over 5 million Hoosier consumers living in rural and non-rural areas of the state. This Consensus Framework will assist our members in improving broadband service to the benefit of all Indiana residents. The Indiana Telecommunications Association therefore urges the Commission to adopt the Framework in its entirety and implement it without modification.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John E. Koppin", with a long horizontal flourish extending to the right.

John E. Koppin, CAE,
President