



February 6, 2009

OPASTCO

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

Ex Parte Notice

**Re: Development of Nationwide Broadband Data to Evaluate Reasonable and Timely Deployment of Advanced Services to All Americans, Improvement of Wireless Broadband Subscribership Data, and Development of Data on Interconnected Voice over Internet Protocol (VoIP) Subscribership
WC Docket No. 07-38**

Dear Ms. Dortch:

On February 6, 2009, Stuart Polikoff, Stephen Pastorkovich, and Brian Ford of the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO), Jill Canfield and Scott Reiter of the National Telecommunications Cooperative Association (NTCA), Ken Johnson of the Rural Telecommunications Group (RTG), and Derrick B. Owens of the Western Telecommunications Alliance (WTA) (collectively, the Associations) participated in a conference call with Julie Veach, Kirk Burgee, Randy Clarke, Rodger Woock, Ellen Burton and Alan Feldman of the Wireline Competition Bureau. The purpose of the call was to discuss the FCC's revised and recently approved Local Telephone Competition and Broadband Reporting Form (FCC Form 477), the impending March 1 filing deadline, and ways in which the FCC may assist small, rural carriers in completing the Form via the Commission's forthcoming electronic interface.

The Associations support efforts to improve the quality and accuracy of the Commission's broadband subscribership data, in order to facilitate policies and procedures that will help rural broadband providers improve the availability of these critical services to consumers. The Associations are committed to helping the Commission work with service providers in order to collect this data in a manner that is productive and minimally disruptive to rural carriers' efforts to expand the availability of robust, affordable advanced telecommunications services.

To that end, the Associations urge flexibility regarding the March 1, 2009 deadline for the new version of the Commission's Form 477. Instructions and screen shots of this complex online form have only recently become available. It is the Associations' understanding that the final online version of the form will become

available, at best, only one week prior to the March 1 filing deadline. With so little time to learn the mechanics of this complex and lengthy new form, rural providers will be hard pressed to provide accurate data to the Commission.

The Associations understand the desire for more complete data regarding broadband availability and subscribership. It is precisely because this data has become an important priority that flexibility regarding the deadline is imperative. Allowing rural carriers such a limited amount of time to learn the new system and how to input their data correctly will greatly increase the risk of errors, diluting the data collection's utility. The Associations stress that accurate data, brought about by a slight delay, will be more useful to policymakers than data collected in a manner that emphasizes speed at the expense of accuracy.

The Associations appreciate the FCC's outreach to industry groups, and encourage the Commission to explain the details of the new Form 477 through web pages, conference calls, and videos, as well as through direct telephone and e-mail contact. The Associations look forward to working with the Commission to assist with this outreach effort.

In accordance with FCC rules, this letter is being filed electronically in the above-captioned docket.

Respectfully submitted,

**THE ORGANIZATION FOR THE PROMOTION
AND ADVANCEMENT OF SMALL
TELECOMMUNICATIONS COMPANIES**

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