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December 6, 2012

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**FILED VIA ECFS**

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

**RE: WC Docket Nos. 10-90, 07-135, 05-337 and 03-109; CC Docket Nos. 01-92 and 96-45; and GN Docket No. 09-51 and WT Docket No. 10-208**

Dear Ms. Dortch:

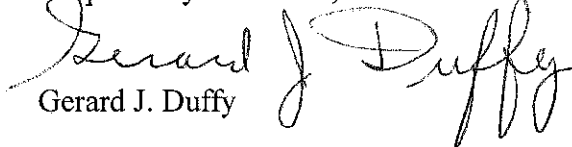
On December 5, 2012, Paul Kelly of Cordova Telephone Cooperative, Inc.; Doug Neal of OTZ Telephone Cooperative, Inc.; and Derrick Owens and Gerard Duffy representing the Western Telecommunications Alliance met with Michael Steffen, Legal Advisor to Chairman Julius Genachowski, and Rebekah Goodheart and Joseph C. Cavender of the Wireline Competition Bureau, to discuss various universal service fund ("USF") and intercarrier compensation ("ICC") matters affecting Alaskan rural telephone companies and their customers.

The topics of discussion included: (1) the high costs of constructing, maintaining and operating wireline and wireless telecommunications networks in the harsh climate and sparsely populated areas of Alaska (Mr. Neal indicated that his service area was the size of Indiana and contains approximately 2,800 customers); (2) the reliance by some Alaskan rural telephone companies upon USF and ICC for as much as 80-to-84 percent of their revenue streams; (3) the immediate dangers to the financial viability of Alaskan rural telephone companies from the scheduled 5 percent per year reductions in eligible recovery for ICC (which comprises the major portion – often more than 60 percent -- of the total USF and ICC revenues of such companies); (4) the unpredictability of future USF support due to regression model uncertainties; (5) the manner in which the scheduled ICC revenue reductions and unpredictable future USF support have deterred investment projects and hiring by Alaskan rural telephone companies; and (6) the likelihood of significant service losses and public safety hazards if Alaskan rural telephone companies lose their ability to sustain operations in areas that no other carriers have ever shown a substantial desire to serve.

Marlene H. Dortch, Secretary  
December 6, 2012  
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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: Michael Steffen  
Rebekah Goodheart  
Joseph C. Cavender