

February 12, 2009

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW, TW-A325
Washington, D.C. 20554

Ex Parte

In the Matter of 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 11, 2009, Jill Canfield and Scott Reiter of the National Telecommunications Cooperative Association (NTCA), Stuart Polikoff and Brian Ford of the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO), Joshua Seidemann of the Independent Telephone & Telecommunications Alliance (ITTA), Derrick Owens, Eric Keber and Gerry Duffy for the Western Telecommunications Alliance (WTA), Evelyn Jerden of LICT Corporation, John Kuykendall and Chuck Richoz of John Staurulakis, Inc (JSI), Mark Gailey of Totah Communications, Inc, and Jim DeLoss and Kevin Kastor of Consolidated Communications (collectively, the Participants) participated in a conference call with Ellen Burton, Alan Feldman, Mike Goldstein, Kenneth Lynch, Jim Eisner, Rodger Woock, Jeremy Miller, Kirk Burgee and Randy Clarke 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 2 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 Participants 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. However, given the fact that the form was only recently approved and an electronic version is not yet available, small and rural providers need additional time to submit accurate and complete data. The Participants urged the Commission to extend the deadline for submitting the new version of the Form 477.

Ms. Marlene H. Dortch
February 12, 2009
Page Two

Participants discussed general data collection and logistical problems associated with the Form 477 submission. Individual participants explained that different billing vendors could provide different levels of support and many small companies will be using a deliberate manual process to complete the form. Others explained that it will be logistically difficult, if not impossible, to meet a March 2 deadline. Problems with the Geocode system were explained and Participants expressed their concern about the accuracy of the data collected if the Commission forces a hasty submission. Participants also sought clarification from the Commission regarding the cut-off date for data submitted.

The Participants understand the desire for more complete data regarding broadband availability and subscribership and appreciate the FCC's outreach to industry groups. The Participants look forward to working with the Commission to assist with this outreach effort, but urge the Commission to offer small and rural providers flexibility with regard to the filing deadline.

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

Sincerely,
/s/ Jill Canfield
Jill Canfield
Senior Regulatory Counsel
Legal & Industry

cc: Ellen Burton
Alan Feldman
Mike Goldstein
Kenneth Lynch
Jim Eisner
Roger Woock
Jeremy Miller
Kirk Burgee
Randy Clarke