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EX PARTE MEMORANDUM

October 10, 2012

Marlene H. Dortch, Secretary
Federal Communications Commission
445 – 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: Universal Service Contribution Methodology, WC Docket No. 06-122
A National Broadband Plan For Our Future, GN Docket No. 09-51

On October 9, 2012, Dave Wenhold and the undersigned, representing the Association of TeleServices International, Inc. (ATSI), met with various officials of the Wireline Competition Bureau, Telephone Access Policy Division, concerning the contribution methodology for funding the Universal Service Fund (USF). The Commission officials attending the meeting included Vickie Robinson, TAPD Deputy Chief; Charles Eberle; Carol Pomponio; Joe Lilly; Ernesto Beckford and Erica Myers.

ATSI expressed concern that recent trade press reports indicate that assessing broadband Internet access service for USF contributions has been taken “off the table” by the Chairman, and that the remaining proposed reforms to the current revenues contribution methodology may not have a sufficient impact on the contribution factor. ATSI reiterated its support for assessing broadband Internet access and wireless data services for USF contributions, as set forth in its comments on the 2012 FNPRM (see <http://apps.fcc.gov/ecfs/document/view?id=7021984503> at pp. 6-8), in view of the financial support these services receive from USF. ATSI suggested that a university-based study might be the best practical way to demonstrate that assessing broadband for USF would not harm broadband adoption, rather than relying on data from stakeholders. ATSI further reiterated its strong opposition to a Numbers contribution methodology, in light of the unfair financial penalties such a system would impose on the Telephone Answering Service industry; and it also acknowledged that a properly structured connections methodology could be a satisfactory alternative to current revenues contribution system.

Respectfully submitted,

s/Kenneth E. Hardman

cc: Vickie Robinson
Charles Eberle
Carol Pomponio
Joe Lilly
Ernesto Beckford
Erica Myers