

October 18, 2017

Via Electronic Submission

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

Re: Notice of *Ex Parte* Presentation, *Accelerating Wireless Broadband Deployment*, WT Docket No. 17-79 and *Accelerating Wireline Broadband Deployment* WC Docket No. 17-84

Dear Ms. Dortch:

On October 17, 2017, Martha Duggan, Senior Director, Regulatory Affairs for the National Rural Electric Cooperative Association (“NRECA”) and the undersigned met with the following staff in the Wireline Competition Bureau; Eric Ralph and Lisa Hone with the Bureau front office, and Mike Ray, John Visclosky, Adam Copeland and Zach Ross with the Competition Policy Division relating to the Notice of Proposed Rulemaking and Notice of Inquiry in the proceedings referenced above.

We discussed the principal points raised in NRECA’s Reply Comments filed on July 17, 2017. Our discussion focused on impediments to broadband deployment in rural communities, especially those served by rural electric cooperatives. Broadband deployment by major service providers in rural communities is primarily a function of population density. Despite this fact, some major service providers attempt to establish a causal relationship between unregulated pole attachment rates and broadband deployment. Examples were provided in which electric cooperatives offered major service providers the federal cable rate or even free pole attachments in exchange for coverage of their entire cooperative service territory. The offers were not accepted, indicating that pole attachment rates are not the impediment to deployment some major providers claim.

A study of three states, comparing the deployment rates of broadband in rural areas served by electric cooperatives to broadband deployment in rural areas served by investor owned electric utilities, found a strong correlation between low household density per square

mile and lower broadband penetration in rural parts of the country. The rural areas served by investor owned electric utilities are subject to FCC pole attachment rates. If the pole attachment rates of electric cooperatives are truly the driver of provider decisions, one would expect the availability of broadband to be significantly higher in the rural areas served by investor owned utilities. That conclusion was not borne out by the study. Deploying broadband to the rural communities served by electric cooperatives is simply more expensive due to the lower population density, and not unregulated pole attachment rate.

If you have any questions regarding this ex parte notice, please contact the undersigned.

Sincerely,

/s/

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cc: Eric Ralph
Lisa Hone
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