



February 27, 2018

**Ex Parte**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: Connect America Fund (WC Docket No. 10-90); ETC Annual Reports and Certifications (WC Docket No. 14-58); Rural Broadband Experiments (WC Docket No. 14-259); Connect America Fund Phase II Auction (AU Docket No. 17-182)

Dear Ms. Dortch:

On Thursday, February 22, 2018, Jeff Lanning, Richard Rousselot, Jeff Glover and Tiffany Smink (CenturyLink), Alan Buzacott (Verizon), Cathy Carpino (AT&T), AJ Burton (Frontier), Malena Barzilai (Windstream) and I met with Sammy Khan and Sherika Wynter (USAC) and Jesse Jachman, Eric Ralph, Steve Rosenberg, Gilbert Smith, Talmadge Cox, Stephen Wang and Alex Minard (FCC WCB) to discuss certain Connect America Fund Phase II (CAF II) reporting and transition issues.

Concerning the High Cost Universal Broadband (HUBB) portal, we outlined concerns with the current process for updating information already submitted to and incorporated in the HUBB. Changes to submitted information occur for a variety of reasons, including natural disasters, more accurate geo-coding methodologies and network changes. We discussed the need to permit providers to make automated updates, including dropping locations, to previously submitted information. The current suggested process of emailing USAC personnel with a detailed explanation for every dropped location who, in turn, will forward that email to FCC staff for their review and approval, is not workable at scale.

In addition, we discussed approaches to rationalizing legacy obligations and support in light of the upcoming CAF II Auction. In particular, we suggested that the FCC could utilize cost model support levels to create a factor to adjust the level of frozen support as a function of the funded areas that are successfully bid on and won within the CAF II Auction. For each state that was eligible to receive legacy support as a result of the refusal of the Commission's state-level commitment, the total model support for the CAF II Auction funded census blocks would become the denominator of the factor that is determined for that state. The numerator should be the sum of the model support for those CBs that are successfully bid on in the CAF II Auction. This factor is applied to the amount of legacy support a price cap carrier was eligible to receive in that state immediately after declining the state level commitment and determines the level of reduction and resultant level of support for legacy voice obligations within the transition.

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Please contact the undersigned should you have any questions.

Respectfully submitted,

USTELECOM ASSOCIATION



By: \_\_\_\_\_

Jonathan Banks

Senior Vice President – Law & Policy

cc: Talmadge Cox  
Jesse Jachman  
Alex Minard  
Eric Ralph  
Steve Rosenberg  
Gilbert Smith  
Stephen Wang