



October 26, 2018

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

**Re: *Ex Parte* Communication: WC Docket Nos. 10-90, 14-58, 07-135, and CC
Docket 01-92**

Dear Ms. Dortch:

On October 25, 2018, Genny Morelli and the undersigned of ITTA met with Jamie Susskind of the Office of Commissioner Carr regarding the *NPRM* in the above-referenced proceedings.¹

During the meeting, we discussed various points raised in ITTA's comments on the *NPRM*,² including A-CAM funding needs and attendant deployment obligations. We emphasized that the Commission should fully fund separate budgets for the A-CAM program and legacy support mechanisms, as well as evaluate sums required for CAF ICC support separate from the budgets for the A-CAM program and legacy mechanisms.³ Funding participants in the A-CAM program to \$200 per eligible location and fully funding the legacy mechanisms would have a de minimis impact on consumers' bills.

We also reiterated that if current A-CAM carriers are funded at \$200 per location under reasonable terms and conditions and the legacy mechanisms are fully funded, the Commission should extend a second A-CAM offer to all carriers on legacy mechanisms.⁴

¹ *Connect America Fund et al.*, Report and Order, Third Order on Reconsideration, and Notice of Proposed Rulemaking, FCC 18-29 (Mar. 23, 2018) (*NPRM*).

² See Comments of ITTA – The Voice of America's Broadband Providers, WC Docket Nos. 10-90, 14-58, and 07-135, CC Docket No. 01-92 (May 25, 2018).

³ See *id.* at 9-19.

⁴ See *id.* at 21-22.

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Please do not hesitate to contact the undersigned with any questions regarding this submission.

Respectfully submitted,

/s/

Michael J. Jacobs
Vice President, Regulatory Affairs

cc: Jamie Susskind