



March 8, 2019

Ex Parte

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th St. SW
Washington, D.C. 20554

Re: USTelecom Ex Parte Notice, WC Dkt. No. 11-10, *Modernizing the FCC Form 477 Data Program*; WC Dkt. No. 10-90, *Connect America Fund*

Dear Ms. Dortch:

On March 6, 2019, USTelecom and several of its members met with members of the Rural Broadband Auctions Task Force and Office of Economic Analysis. The full list of participants is listed in Appendix A.

USTelecom described its proposed reforms to the FCC Form 477 process, which would provide a much more granular view into not only the areas that have broadband service but also a precise view of those locations that lack broadband service.¹ USTelecom stressed the importance of granular data to make federal funding programs, including CAF 3, as targeted as possible; we will only be able to close the digital divide through an efficient use of limited funds. USTelecom's mapping proposal has the added benefit of allowing auction participants to bid with the full knowledge of exactly how many locations in a census block require service and, importantly, exactly where those locations are. USTelecom also expressed its views that any future funding programs should target all unserved locations, not just those previously defined as "high cost," because the market has failed to provide service regardless of predictions about their economic viability.

Please contact me with any questions.

Sincerely,

_____/s/_____
Mike Saperstein
Vice President, Law & Policy

cc: Meeting Participants

¹ See Letter of B. Lynn Follansbee, VP–Law & Policy, USTelecom to Marlene H. Dortch, Secretary, FCC, WC Docket No. 11-10, (Oct. 17, 2018).

Appendix A: Meeting Participants

FCC Wireline Competition Bureau

- Kirk Burgee
- Nathan Eagan
- Chelsea Fallon
- Katie King
- Heidi Lankau
- Sue McNeil (via phone)
- Alexander Minard

FCC Office of Economic Analysis

- Eliot Maenner

Industry

- AT&T: Mary Henze, Mike Lieberman
- Consolidated: Mike Skrivan (via phone)
- Frontier: AJ Burton, Diana Eisner
- USTelecom: Mike Saperstein, Lynn Follansbee (via phone)
- Verizon: Alan Buzacott
- Windstream: Thomas Whitehead