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Executive Director  
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March 13, 2018

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**Ex Parte**

Ms. Marlene H. Dortch  
Secretary, Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: Connect America Fund, WC Docket No. 10-90**

Dear Ms. Dortch:

On March 9, 2018, Tamara Preiss and Alan Buzacott of Verizon met with Suzanne Yelen, Alec MacDonell, Cathy Zima, and Stephen Wang of the Wireline Competition Bureau to discuss the Connect America Fund (CAF) performance testing methodology contemplated by section 54.313(a)(6) of the Commission's rules.<sup>1</sup>

In the meeting, we explained that Commission should adopt the speed measurement methodology well before the start of the CAF auction. In order to determine how much to bid (or whether to bid at all on a particular performance tier), potential bidders need to know how the Commission will assess whether a CAF-supported service is in compliance with the speed requirements. Among other things, potential bidders need to know (1) how the Commission will measure speed, i.e., the permitted measurement tools, the testing window, and the required number of measurements; and (2) how the Commission will determine whether the tested service is compliant, i.e., the statistical standards that the speed measurements will be required to meet.

We also explained that the Commission should adopt speed test standards that are consistent with the real-world performance of comparable services in urban areas. For example, a CAF-supported service in the gigabit performance tier should be considered compliant if it offers comparable performance to a gigabit-class service in urban areas. As the record in this

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<sup>1</sup> 47 CFR § 54.313(a)(6).

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proceeding shows, speed measurements for gigabit-class services in urban areas are limited by technical constraints.<sup>2</sup>

This letter is being filed electronically pursuant to Section 1.1206 of the Commission's rules. Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan Byrnes". The signature is fluid and cursive, with the first name "Alan" and last name "Byrnes" clearly distinguishable.

cc: Suzanne Yelen  
Alec MacDonell  
Cathy Zima  
Stephen Wang

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<sup>2</sup> See Comments of the Rural Electric Cooperatives, WC Docket No. 10-90, at 12 (December 6, 2017).