



May 21, 2018

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

RE: **Ex parte filing** in WC Docket Nos. 10-90, 14-58, 07-135 and CC Docket No. 01-92

Dear Ms. Dortch:

On May 17th, Jeff Smith of GVNW, Eric Schmidt of Home Telephone Co., Kim Harber of Madison Telephone Company, Lee Whitcher of Harrisonville Telephone Company, Kevin Jacobsen of Egyptian Telephone Cooperative Association, and Kevin Osterbur of Alhambra-Grantfork Telephone Company, met telephonically and the undersigned from GVNW Consulting, Inc. (GVNW) met in person with Chief of Staff Travis Litman from Commissioner Rosenworcel's office. On the same day, Jeff Smith, Eric Schmidt, Kim Harber, Lee Whitcher and Kevin Jacobsen met telephonically and the undersigned of GVNW met in person with Chief of Staff Jamie Susskind of Commissioner Carr's office.

The *ex parte* meetings discussed the proposal to change the current competitive overlap rules in the Commission's recently released Notice of Proposed Rulemaking (NPRM) on high-cost universal service support for rate-of-return companies.¹ The participants explained that there is no need to fundamentally alter the 100 percent overlap process, that the Commission's concerns as expressed in the *NPRM* about the current process for determining 100 percent competitive overlap can be easily addressed and that there is no reason to believe that an auction process would be less burdensome than the current overlap determination process.

The participants also noted that the suggested auction mechanism is contrary to the Commission's own policy with respect to high-cost universal service support to competitive areas.

¹ *Connect America Fund, et al.*, WC Docket No. 10-90 *et al.*, Report and Order, Third Order on Reconsideration, and Notice of Proposed Rulemaking (rel. March 23, 2018) ("*NPRM*."

As required by the Commission's rules, this *ex parte* record is now filed in the above referenced dockets. If there are any questions, please call me on 301-738-0020.

Respectfully submitted,

Via ECFS 5/21/2018

David B. Cohen, Esq.
Senior Policy Advisor
GVNW Consulting Inc.

Copy to

Jamie Susskind, FCC
Travis Litman, FCC