



July 13, 2018

***Ex Parte Notice***

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th 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; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92***

Dear Ms. Dortch:

By this letter and consistent with prior comments, NTCA–The Rural Broadband Association (“NTCA”) encourages the Federal Communications Commission (the “Commission”) to grant the Petition for Reconsideration (“Petition”) filed by Hamilton County Telephone Co-op on May 8, 2018 in the above-referenced proceedings.

In its Petition, Hamilton seeks the opportunity to obtain additional Alternative Connect America Cost Model (“A-CAM”) support in light of overstated broadband service coverage claimed by a purported competitor as reflected in the model. Hamilton recounts the evidence it provided in 2016 to demonstrate that the claimed coverage was not real, and notes that the competitor in question subsequently filed reports indicating far less coverage than initially asserted. Petition at 2-3 and 6. No Oppositions to the Petition appear to have been filed, and as noted in comments recently filed, NTCA supports the grant of this Petition as part of broader efforts by the Commission to finalize reforms and address budgetary concerns with respect to high-cost federal universal service fund (“USF”) support received by small rural local exchange carriers. *See* Comments of NTCA, WC Docket No. 10-90, *et al.* (filed May 25, 2018), at 44.

Sufficient support must turn upon an accurate reflection of “facts on the ground.” NTCA supported and continues to support voluntary elections of model-based support for those RLECs that conclude the model reasonably reflects circumstances in the areas they serve. At the same time, NTCA petitioned for reconsideration in 2016 with respect to the model precisely because there were continuing questions as to the model’s transparency and accuracy. Petition for Reconsideration of NTCA, WC Docket No. 10-90, *et al.* (filed May 25, 2016), at 25.

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Although Hamilton elected model-based support because it could help in other portions of its study area, it has highlighted a circumstance in which “facts on the ground” do not match what the model shows based solely upon another party’s clearly identified filing errors. As part of the effort to remedy and “right-size” the budgets for USF programs overall and thereby to make the programs function more effectively as intended and consistent with federal law, NTCA therefore has already supported and continues to encourage a grant of relief to Hamilton.

Thank you for your attention to this correspondence. Pursuant to Section 1.1206 of the rules of the Commission, a copy of this letter is being filed via ECFS.

Sincerely,

/s/ Michael R. Romano

Michael R. Romano

Senior Vice President –

Industry Affairs & Business Development