



July 31, 2019

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

Re: *Ex Parte* Communication: WC Docket No. 10-90

Dear Ms. Dortch:

On July 29, 2019, Genny Morelli and the undersigned of ITTA met with Sue McNeil, Alex Minard, Talmage Cox, Gilbert Smith, and Nissa Laughner of the Wireline Competition Bureau (Bureau) regarding the Public Notice in the above-captioned proceeding seeking comment on approaches to identify and resolve discrepancies between the number of Alternative Connect America Cost Model (A-CAM)-funded locations that A-CAM I and II support recipients are expected to serve and the actual number of locations that support recipients can serve.¹

In the meeting, we noted the consistency in the record in response to the *June 2019 PN* between ITTA's comments² and those filed by numerous other commenters. We particularly focused on various timing considerations raised in the ITTA Comments. For instance, we reiterated that A-CAM support recipients should have flexibility regarding when or if to raise location discrepancy issues, and elaborated on the numerous ways that conducting location discrepancy resolution processes later in the A-CAM term, with up-to-date location information, would be most effective and potentially minimize the efforts associated with such processes for carriers and Commission staff alike.³ Regarding what measures are appropriate to address where a location discrepancy exists, we maintained that even though most A-CAM buildout terms will not end for almost another decade, resolution of what these measures are is appropriate in the near term to provide carriers certainty and the ability to plan for the ramifications of any buildout shortfalls that may occur relative to model-funded locations.

On a substantive level, we described how the vast bulk of deployment costs are devoted to building a network sized to serve all locations in an A-CAM support recipient's service area and how actual, per-location costs are minimal. This is a network engineering and economics

¹ *Wireline Competition Bureau Issues Corrected Alternative Connect America Model II Offers to 37 Companies, Extends the Election Deadline, and Seeks Comment on Location Adjustment Procedures*, Public Notice, DA 19-504, at 2 (WCB June 5, 2019) (*June 2019 PN*).

² See Comments of ITTA, WC Docket No. 10-90 (July 19, 2019) (ITTA Comments).

³ See *id.* at 5-10.

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reality that should guide the Commission's consideration of what measures are appropriate to address the existence of location discrepancies brought to the Commission's attention by A-CAM support recipients.⁴

We also reflected on the numerous manners in which the Connect America Phase II (Phase II) auction and A-CAM programs are distinguishable from each other, meaning that the Commission should enjoy flexibility to accord them dissimilar treatment where appropriate.⁵ We suggested that these distinctions could militate towards the Commission addressing Phase II auction and A-CAM locations discrepancies separately. Such an approach could allow for expedited resolution of Phase II auction location discrepancies, while ensuring careful consideration of the ramifications of any buildout shortfalls that may occur relative to A-CAM support recipients.

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: Sue McNeil
Alex Minard
Talmage Cox
Gilbert Smith
Nissa Laughner

⁴ See *id.* at 4.

⁵ See *id.* at 10-11.