

November 1, 2018

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VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 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:

On October 30, 2018, Andrew Rein, Chief Financial Officer, Hargray Communications (“Hargray”); Trey Judy, Director – Regulatory Affairs, Hargray Communications; and the undersigned of Jenner & Block, representing Hargray Communications; met with Sue McNeil, Suzanne Yelen, Jesse Jachman, Alexander Minard, and Theodore Burmeister (via phone) of the Federal Communications Commission’s (“Commission”) Wireline Competition Bureau.

In the meeting, Hargray urged the Commission to address the unpredictable and insufficient levels of universal support for rate-of-return carriers.¹ In particular, we encouraged the Commission to adopt the proposals set forth in the Unity Letter that was jointly submitted by NTCA – The Rural Broadband Association, USTelecom – The Broadband Association, ITTA – The Voice of America’s Broadband Providers, and WTA – Advocates for Rural Broadband.² Hargray emphasized that current funding uncertainty is deterring investment, harming rural consumers, and preventing carriers serving high cost areas from taking steps that will help close the digital divide. We also discussed a number of ways in which the Commission may be able to provide more certainty regarding future levels of support while advancing the Commission’s

¹ See *In re Connect America Fund, et al.*, WC Docket Nos. 10-90 et al., Report and Order, Third Order on Reconsideration, and Notice of Proposed Rulemaking (Mar. 23, 2018).

² See Letter from Shirley Bloomfield et al., to Marlene H. Dortch, Secretary, FCC, WC Docket No. 10-90 (Oct. 1, 2018); see also Letter from Rebekah Goodheart, counsel for Hargray, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 10-90 (Oct. 15, 2018); Letter from Rebekah Goodheart, counsel for Hargray, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 10-90 (Oct. 55, 2018).

goal of connecting more unserved areas. Finally, Hargray explained that predictable, sufficient funding without arbitrary reductions of support for a period of seven years, which is the term of many commercial loans, is critical for investment decisions.

Please contact me if you have any questions regarding these matters.

Sincerely,

/s/ Rebekah P. Goodheart
Rebekah P. Goodheart

Counsel for Hargray Communications

cc: Sue McNeil
Suzanne Yelen
Jesse Jachman
Theodore Burmeister
Alexander Minard