

November 7, 2019

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th St. SW
Washington, D.C. 20554

Re: USTelecom Ex Parte Notice, WC Docket No. 19-126, *Rural Digital Opportunity Fund*

Dear Ms. Dortch:

On November 7, 2019, representatives of USTelecom, AT&T, CenturyLink, Consolidated, Frontier, Verizon and Windstream (USTelecom) met with FCC Wireline Bureau and Rural Broadband Auctions Task Force Staff; the full list of participants is below.

In the meeting USTelecom highlighted several issues that it raised in its Rural Digital Opportunity Fund comments and reply comments;¹ all discussion was consistent with those documents. Specifically, USTelecom discussed the need for the Commission to use the Rural Digital Opportunity Fund to:

- Invest today in terrestrial broadband to provide a foundation for the future of rural connectivity—wired and wireless;²
- Clearly define transition roles and responsibilities at the program's outset;³
- Use lessons learned from the CAF Phase II Auction to ensure reasonable accountability, while also ensuring the program is not bogged down with unnecessary requirements;⁴
- Reduce the risk of known inaccurate location data.⁵

USTelecom also handed out the attached documents in support of its positions related to transitions⁶ and the positive externalities associated with investing in terrestrial broadband.⁷

¹ Comments of USTelecom—The Broadband Association, WC Docket No. 19-126 (filed Sep. 20, 2019) (USTelecom Comments); Reply Comments of USTelecom—The Broadband Association, WC Docket No. 19-126 (filed Oct. 21, 2019) (USTelecom Reply Comments).

² USTelecom Comments at 20-24; USTelecom Reply Comments at 2-12.

³ USTelecom Comments at 24-34; USTelecom Reply Comments at 12-18.

⁴ USTelecom Comments at 34-47; USTelecom Reply Comments at 18-25.

⁵ USTelecom Comments at 10-20; USTelecom Reply Comments at 25-29.

⁶ Tony Clark and Monica Martinez, *The More Things Change, The More Things Need to Change: Why New Rules Realities Require New Rules*, 2 (Sep. 20, 2019) available at <https://www.ustelecom.org/research/report-the-more-things-change-the-more-things-need-to-change/> (attached as Appendix A).

⁷ Coleman Bazelon, The Brattle Group, *Public Interest Benefits of Expanding Fiber Networks* (Oct. 2019) available at <https://www.ustelecom.org/research/public-interest-benefits-of-expanding-fiber-network/> (attached as Appendix B).

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Please contact me with any questions.

Sincerely,

_____/s/_____
Mike Saperstein

Vice President, Policy & Advocacy

cc: Meeting Participants

Meeting Participants

FCC:

Office of Economics and Analytics: Michael Janson and Jeff Prince in person; Elliott Maenner and Kelly Quinn via phone

Wireline Competition Bureau: Ian Forbes, Lauren Garry, Trent Harkrader, Jesse Jachman, Katie King, Alexander Minard, and Ryan Palmer

USTelecom:

AT&T: Mary Henze, Brendan Haggerty

Consolidated: Mike Skrivan (via phone)

CenturyLink: Jeff Lanning, Tiffany Smink (via phone)

Frontier: Diana Eisner

USTelecom: Patrick Halley, Mike Saperstein

Verizon: Alan Buzacott

Windstream: Steve Long