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November 13, 2016

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

Dear Ms. Dortch:

After months of calculating and recalculating which direction would be best for our company to go in order to be able to survive and to be able to best serve the rural customers in our serving area, we finally made the decision to go with the A-CAM Model over Legacy Support even though in our situation we are one of the "losers" under A-CAM. Understanding that this is what the FCC wanted companies to do, it is incredulous to now find out that not only do we not know how much support we will receive under A-CAM but we do not even know if we will still be eligible for model-based support. And after seeing what the "budget control mechanism" did to our projected Rate of Return support, it is now readily apparent that there is simply not enough funding being allocated in order to meet the demands of Congress' goal of rural broadband expansion.

To think that other USF programs (Lifeline, E-Rate, RHC, etc) are not only being funded appropriately, but are even being increased to allow for inflation, it seems only logical that the same consideration should be made in order for rural America's customers to receive the dependable communication services that they have always relied on, and to be assured of continued expanded, enhanced broadband technology as it is made available.

We agree with NTCA that "...in finalizing the implementation of model-based support, the Commission should: (1) ensure appropriate recalibration of buildout obligations in light of any USF support shortfalls; and (2) avoid any adverse impact of any kind now or in the future upon the hundreds of companies that did not elect model-based support but yet already face significant USF support reductions in 2017 due to the "budget controls" that will hinder their ability to keep investing, to repay loans for investments already made, and to offer affordable, quality broadband services to consumers."[1]

We also feel that any reduction to the A-CAM budget shortfall should attempt to keep as many companies as possible eligible to participate in the A-CAM. The decision to elect A-CAM was not an easy one for our company and we have spent significant time and effort to determine whether or how the A-CAM can benefit our customers.

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[1] *Ex Parte* Notice dated November 10, 2016, Michael Romano, NTCA to Ms. Marlene H. Dortch, Secretary, Federal Communications Commission.

We are committed to fulfilling the goal of affordable stand-alone broadband and greater broadband deployment in rural America. We feel that we have an obligation to serve the areas that other carriers long ago left behind and that rural America deserves the chance to participate in the ever-changing world of technology. We are hopeful that the Commission understands how essential our networks are in order to make education, low-income, and even mobility goals a success. We appreciate any consideration that can be given to this important issue.

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

Sincerely,

Mark Washington

Mark A. Washington
Chief Executive Officer

MW/jb