



November 30, 2018

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

**Re: *Ex Parte* Communication: WC Docket Nos. 10-90, 14-58, 07-135, and CC  
Docket 01-92**

Dear Ms. Dortch:

On November 28, 2018, Genny Morelli and the undersigned of ITTA met with Arielle Roth of the Office of Commissioner O’Rielly regarding the draft Report and Order, Further Notice of Proposed Rulemaking, and Order on Reconsideration in the above-referenced proceedings.<sup>1</sup>

During the meeting, we expressed support for the draft’s provisions related to increased funding for A-CAM carriers and attendant commitments to buildout at additional locations at speeds of 25/3 Mbps; ensuring sufficient and predictable support for legacy rate-of-return carriers; a new model offer for legacy carriers; and separate budgets for the model-based and legacy programs. We also discussed some concern with the lack of a challenge process for the new model offer.<sup>2</sup>

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: Arielle Roth

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<sup>1</sup> *Connect America Fund et al.*, Report and Order, Further Notice of Proposed Rulemaking, and Order on Reconsideration, FCC-CIRC1812-02 (Public Draft Nov. 21, 2018).

<sup>2</sup> *See id.* at 15-17, paras. 45-49.