



October 14, 2014

***Ex Parte Notice***

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re: *Connect America Fund, WC Docket No. 10-90; Modernizing the E-rate Program for Schools and Libraries, WC Docket No. 13-184; Protecting and Promoting the Open Internet, GN Docket No. 14-28***

Dear Ms. Dortch:

On Friday, October 10, 2014, the undersigned, on behalf of NTCA–The Rural Broadband Association (“NTCA”), discussed matters in the above-referenced proceedings with Julie Veach, Chief of the Wireline Competition Bureau.

During the conversation, I discussed the need for updates to high-cost rules for areas served by rural, rate-of-return-regulated local exchange carriers. *See* Comments of NTCA, *et al.*, WC Docket No. 10-90, *et al.* (filed Aug. 8, 2014), at 6-28 and 34-60. NTCA urged the Federal Communications Commission (the “Commission”), even as it may consider alternative paths of support, to move forward as soon as possible with a well-constructed and carefully managed transition away from legacy support mechanisms to a simple and straightforward updated mechanism focused on supporting broadband-capable networks in high-cost areas served by smaller carriers.

I also urged the Commission to employ granular assessments of whether schools and libraries face specific problems of “availability” or “affordability” in fashioning E-rate solutions, consistent with NTCA’s prior comments. *See* Comments of NTCA, WC Docket No. 13-184 (filed April 7, 2014), at 4-5. Finally, NTCA described its position with respect to the Open Internet proceeding, expressing support consistent with prior comments for targeted and carefully tailored steps, based upon a solid legal foundation, to promote seamless interconnection across the “Service and Network Ecosystem” that composes the Internet. *See* Comments of NTCA, GN Docket No. 14-28 (filed July 18, 2014), at 2-17.

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,  
/s/ Michael R. Romano  
Michael R. Romano  
Senior Vice President – Policy

cc: Julie Veach