November 13, 2014

***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; *Universal Service Reform – Mobility Fund*, WT Docket No. 10-208; *ETC Annual Reports and Certification*, WC Docket No. 14-58; *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135; *Developing an Unified Intercarrier Compensation Regime*, CC Docket No. 01-92**

Dear Ms. Dortch:

This letter is sent as a follow-up to information provided by NTCA–The Rural Broadband Association ("NTCA") in several recent *ex parte* filings. *See, e.g.*, *Ex Parte* Letters from Michael R. Romano, Senior Vice President – Policy, NTCA, to Marlene H. Dortch, Secretary, Federal Communications Commission (the "Commission"), WC Docket No. 10-90, *et al*. (filed Oct. 10, 2014 and Oct. 20, 2014).

Those prior filings related to a proposal to modify the way in which High Cost Loop Support ("HCLS") distributions are calculated. NTCA provides the attached document as further information showing effects of its proposal on HCLS distributions from 2014 onward in comparison to current rules and also the proposal put forward by the Commission earlier this year.

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

Enclosure

cc: Suzanne Yelen
Ted Burmeister
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Analysis of Support Impacts Under Alternative NACPL Scenarios

2014 Current Rules

Study Area Loop Cost	Total SA	Total Lines	Total Support	Support Per Line Per Month
< $800.00	486	2,279,776	$ 11,901,067	$ 0.44
$800 - $1,600	435	1,552,163	$ 420,658,621	$ 22.58
> $1,600	174	255,657	$ 300,538,221	$ 97.96
	1,095	4,087,596	$ 733,097,909	$ 14.95

2014 Support based on study area loop cost data and loop counts from latest view annual submission data exclusive of quarterly updates.
2015 and beyond based on study area loop cost data and loop counts from Sept 2014 Annual USF Submission

	2015 Current Rules				Frozen NACPL		50/50 Proposal	
Study Area Loop Cost	Total SA	Total Lines	Total Support	Support Per Line Per Month	Total Support	Support Per Line Per Month	Total Support	Support Per Line Per Month
< $800.00	425	1,988,133	$ 4,766,671	$ 0.20	$ 10,295,497	$ 0.43	$ 7,403,288	$ 0.31
$800 - $1,600	478	1,621,488	$ 392,288,440	$ 20.16	$ 402,564,185	$ 20.69	$ 397,795,091	$ 20.44
> $1,600	192	303,717	$ 337,348,609	$ 92.56	$ 321,560,375	$ 88.23	$ 329,221,678	$ 90.33
	1,095	3,913,338	$ 734,403,720	$ 15.64	$ 734,420,057	$ 15.64	$ 734,420,057	$ 15.64

	2020 Current Rules			Frozen NACPL		50/50 Proposal	
Total SA	Total Lines	Total Support	Support Per Line Per Month	Total Support	Support Per Line Per Month	Total Support	Support Per Line Per Month
425	1,988,133	$ 25,308	$ 0.00	$ 8,900,216	$ 0.37	$ 2,584,595	$ 0.11
478	1,621,488	$ 314,845,123	$ 16.18	$ 348,973,582	$ 17.93	$ 335,601,762	$ 17.25
192	303,717	$ 321,731,969	$ 88.28	$ 278,730,992	$ 76.48	$ 298,418,434	$ 81.88
1,095	3,913,338	$ 636,602,400	$ 13.56	$ 636,604,791	$ 13.56	$ 636,604,791	$ 13.56

	2025 Current Rules			Frozen NACPL		50/50 Proposal	
Total SA	Total Lines	Total Support	Support Per Line Per Month	Total Support	Support Per Line Per Month	Total Support	Support Per Line Per Month
425	1,988,133	$ -	$ -	$ 7,714,646	$ 0.32	$ 583,891	$ 0.02
478	1,621,488	$ 245,333,794	$ 12.61	$ 302,487,913	$ 15.55	$ 281,754,316	$ 14.48
192	303,717	$ 306,464,427	$ 84.09	$ 241,602,116	$ 66.29	$ 269,466,468	$ 73.94
1,095	3,913,338	$ 551,798,220	$ 11.75	$ 551,804,676	$ 11.75	$ 551,804,676	$ 11.75