

**Cheryl L. Parrino, LLC**  
**Parrino Strategic Consulting Group**

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November 19, 2014

VIA ELECTRONIC FILING – NOTICE OF EX PARTE

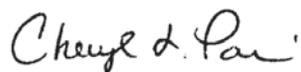
Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Re: *In the Matter of the Connect America Fund*, WC Docket No. 10-90 and *High-Cost Universal Service Support*, WC Docket No. 05-337

Dear Ms. Dortch:

On November 17, 2014, I met with Ms. Carol Matthey of the WCB on behalf of the Nebraska Rural Independent Companies (“NRIC”). I reviewed the NRIC plan included in the comments that were filed by NRIC on August 8, 2014 in response to the Commission's FNPRM for reforming ROR Universal Service. I highlighted that the plan provided an option for carriers to remain on capped existing support or transition to support that is based on a model that has been refined based on ROR characteristics, recommended a reasonable transition period for moving carriers to long-term ROR CAF, recommended that the process for determining whether a competitor provides comparable service in ROR census blocks should be different than the process used for PC carriers and that the FCC should adopt a rule that presumes that in-town areas are areas where a business case can be made or where there are likely competitors and thus support would not be provided to those areas and that out-of-town areas are non-competitive absent a showing that a competitor serves the entire census block and demonstrates that the service provided meets the Commission's performance standards and recognized that all carriers should share in the burden of staying within the budget during the transition. I indicated that NRIC is in the process of fleshing out the details of this plan and sought guidance on the appropriate timing for an in-person meeting to discuss those details.

Sincerely,



Cheryl L. Parrino

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Cc: Ms. Carol Matthey