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January 30, 2015

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

**Re: Open Internet, GN Docket No. 14-28  
USF Contributions, WC Docket No. 06-122  
Pole Attachments, WC Docket No. 07-245**

Dear Ms. Dortch:

On January 30, 2015, I spoke by phone with Matt DelNero and Carol Matthey of the Wireline Competition Bureau. I expressed concern that classifying broadband Internet access services as Title II telecommunications services would lead to the imposition of Universal Service Fund contribution requirements on broadband services for the first time. Applying the current revenue-based contribution regime to broadband services would result in new fees on broadband customers that would undermine the efforts being made by cable operators and the Commission to promote broadband adoption. I encouraged the Commission to forbear from the contribution requirement or, at a minimum, defer its application until the Commission can fully consider the ramifications of requiring broadband services to contribute.

Consistent with NCTA's January 22, 2015, ex parte letter, I also reiterated the importance of ensuring that any decision in the *Open Internet* proceeding preserve the existing pole attachment rights of cable operators, including existing rates, pursuant to Section 224 of the Act.<sup>1</sup> I explained that a failure by the Commission to preclude pole owners from raising attachment rates will impose massive new costs on the cable industry and dampen incentives to expand broadband networks, particularly in rural areas.

Respectfully submitted,

/s/ **Steven F. Morris**

Steven F. Morris

cc: M. DelNero  
C. Matthey

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<sup>1</sup> See Letter from Steve Morris, NCTA, to Marlene H. Dortch, Secretary, Federal Communications Commission, GN Docket No. 14-28 (filed Jan. 22, 2015).