



May 14, 2015

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Room TW-A325  
Washington, D.C. 20554

RE: **Ex parte filing** in WC Docket No. 10-90

Dear Ms. Dortch:

On May 12, Jeffrey H. Smith and the undersigned from GVNW Consulting, Inc. (GVNW) conducted an ex parte meeting with Amy Bender from Commissioner O'Rielly's office.

The ex parte focused on the impact for non-model rate-of-return carriers from various options for funding USF increases for elective model adoption. Some of the scenarios frustrate the deployment of rural broadband that is needed to bring the benefit of this platform to the non-urban portions of the country.

We also discussed the need for rural support mechanisms to be updated for the broadband platform in the very near term to the baseline proposal from NTCA, WTA, ERTA, and NECA that would achieve long overdue equity in the support sphere for carriers whose customers order only a data connection. We stressed the need for timely reform in 2015 for non-model based support for rural carriers.

We also reinforced the public policy benefits of adopting the consensus Alaska plan.

As required by the Commission's rules, this ex parte record is now filed in the above referenced docket. If there are any questions, please call me on 202-236-3947.

Respectfully submitted,

Via ECFS 5/14/15

David B. Cohen  
Senior Policy Advisor

Cc: Amy Bender, FCC  
Steve Merriam, ASTAC  
Christine O'Connor, ATA