



David H. Armistead
General Counsel & Secretary

May 18, 2015

By Electronic Transmission

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

***RE: Connect America Fund, WC Docket No. 10-90; Universal Service Contribution
Methodology, WC Docket No. 06-122***

Dear Ms. Dortch:

On May 14, 2015, Michael Gottdenker, Chairman and Chief Executive Officer, Andrew Rein, Vice President, Strategic Planning and Development, and the undersigned, General Counsel and Secretary, all of Hargray Communications Group, Inc. ("Hargray"), met with Carol Matthey and Alexander Minard of the Wireline Competition Bureau to discuss issues pending in the above-cited proceedings relating to the reform of the FCC's system for providing support to high-cost, rate-of-return local exchange carriers. In the course of that discussion, the Hargray representatives noted the problematic results that were generated for many carriers by the current version of the forward-looking cost model. The Hargray representatives also stressed that Hargray's paramount concern is that the Commission adopt an equitable reform plan that provides the certainty that corporations require to make and maintain investments in critical broadband infrastructure. Finally, they pointed out that the Commission could begin the reform process by allowing carriers to elect to receive support based on the cost model so long as the Commission also added safeguards to the model that would prevent precipitous increases or decreases in individual company support.

If you have any questions, please contact the undersigned.

Respectfully submitted,

/s/ David Armistead
David Armistead

cc: Carol Matthey
Alexander Minard