



July 10, 2015

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

Re: **WC Docket No. 10-90, Connect America Fund; WC Docket No. 05-337, High-Cost Universal Service Support**

***Ex Parte Filing***

Dear Ms. Dortch:

Alexicon Telecommunications Consulting is submitting this *ex parte* filing to recap the conference call on Thursday July 9<sup>th</sup>, 2015 with Nicholas Degani from Commissioner Pai's office. Also on the call were Greg Guice with Akin Gump Strauss Hauer & Feld and Craig Baumgartner, Zachary Cochran, and Doug Kitch with Alexicon Telecommunications Consulting.

The parties discussed Commissioner Pai's plan to reform universal service funding in a manner that incorporates minimal and targeted changes, but also provides for stand-alone broadband service into existing mechanisms. Alexicon agrees that Part 54 of the Commission's rules can readily incorporate the proposal and also agrees with the Commissioner's statement that loops used for stand-alone broadband transmission service shall be treated as working loops (or lines) for purposes of calculating the monthly per-line limit on universal service support. This plan would provide an option to ACAM model-based support for rate of return carriers choosing funding based more on the intended principles of traditional rate of return regulation.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS. Please contact the undersigned with any questions.

Sincerely,

Doug Kitch, Principal  
Enclosure