



Filed Via ECFS

July 22, 2015

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

RE: Notice of Ex Parte – WC Docket No. 10-90, Connect America Fund; WC Docket No. 05-337, High-Cost Universal Service Support

Dear Ms. Dortch:

On July 16, 2015, Jerry Weikle, representing ERTA, met by phone with Nicolas Degani of Commissioner Ajit Pai's office.

There was discussion about Commissioner Pai's "Plan to Support Broadband Deployment in Rural America" that was released on June 29, 2015. I stated that ERTA supports simple solutions and that this plan is simple. It is possible it could help Rate of Return companies serve customers that want broadband only without voice and without the financial penalties imposed by current rules. We discussed some basic mechanics of the plan. The plan certainly addresses cost companies and ERTA suggested some further review would be good to avoid any unintended consequences for average schedule companies.

We discussed the A-CAM model and results. I stressed that companies operating in the eastern states served by ERTA are generally losers in terms of projected model support whether they have built out fiber to customers or not. Fiber is needed to offer speeds of 10/1 and higher. Companies need certainty to operate and obtain loans needed for network upgrades, large losses of support do not provide the certainty banks look for when loaning money.

I asked for a status of an Emergency Petition for Waiver filed by NTCA–The Rural Broadband Association ("NTCA"), the National Exchange Carrier Association ("NECA"), ITTA, the Eastern Rural Telecom Association ("ERTA"), WTA–Advocates for Rural Broadband, Frontier Communications Corporation, and Windstream Communications, Inc. on July 7, 2014 for waiver of Section 51.913(a) of Commission rules dealing with originating VoIP traffic. There has been no action on the Waiver and as a result, a loss of revenue and cash flow has been experienced by companies.

If there are any questions, I can be reached at 704.782.7738.

Sincerely,

/s/ Jerry Weikle

Jerry Weikle
Regulatory Consultant

cc: Nicholas Degani