



Advocates for Rural Broadband

Mark M. Gailey  
President

Kelly Worthington  
Executive Vice President

August 3, 2015

**Filed Via ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

**RE: *Connect America Fund*, WC Docket No. 10-90**

Dear Ms. Dortch:

On Monday, August 3, 2015, Derrick Owens and Gerry Duffy representing WTA – Advocates for Rural Broadband (“WTA”) met with Commissioner Jessica Rosenworcel and Travis Litman, her Legal Advisor, to discuss the status of universal service reform.

WTA reported that it and other rural telephone industry stakeholders had agreed upon a two-path approach to universal service reform – a “Rate-of-Return Path” that would update high-cost support mechanisms to address consumer demand for broadband services, and a “Model-Based Path” that would employ a voluntary cost model as an alternative means to calculate and distribute high-cost support. WTA discussed the various ways that the “Rate of Return Path” options under discussion could affect broadband deployment and adoption, existing high cost mechanisms, present and future infrastructure investment, operating expenses and cost recovery from consumers. WTA also emphasized the need for any and all Model implementation to be voluntary, as well as the prospects for early opt-in to the Model and for ultimate revision of the existing price-cap-based Model to make it more applicable to and accurate for smaller rural telephone companies.

Pursuant to Section 1.1206(b) of the Commission's Rules, this submission is being filed for inclusion in the public record of the referenced proceedings.

Respectfully submitted,

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cc: Commissioner Jessica Rosenworcel  
Travis Litman