



**Jeffrey S. Lanning**

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**EX PARTE NOTICE**

October 1, 2015

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

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

Dear Ms. Dortch:

On September 29, 2015, Melissa Newman and Jeff Lanning of CenturyLink met with Amy Bender of the Office of Commissioner O’Rielly, and Jeff Lanning met with Alexander Minard of the Wireline Competition Bureau by phone. On October 1, Jeff Lanning met with Nicholas Degani of the Office of Commissioner Pai by phone. All of these meetings involved discussions of the Application for Review filed by Co-Mo Comm, Inc. (Co-Mo) and United Services, Inc. (United) seeking review of the Wireline Competition Bureau (Bureau) decision denying their Connect America Fund (CAF) Phase II challenges filed to preclude the use of CAF II support to deploy broadband in a number of census blocks in Missouri.

CenturyLink explained that the Bureau correctly rejected the Co-Mo and United challenges based on the evidence submitted by the parties, which did not meet the criteria for sustaining a challenge. In addition the Application for Review is procedurally defective and inconsistent with the CAF II challenge process in that it submits new evidence that was not presented to the Bureau. Finally, Co-Mo and United failed, even with the new evidence, to show that they provide the requisite voice service, particularly in census blocks where their own evidence shows they do not have customers.

CenturyLink further explained that it has analyzed the CAF II offer of support it accepted in Missouri and believes that it will be able to meet the CAF II deployment obligation in the state without counting any locations in the census blocks challenged by Co-Mo and United. Accordingly, even if the Commission grants the Application for Review, it should direct the Bureau not to reduce the amount of CAF II funding for Missouri. Instead, the challenged census blocks should simply be removed from the list containing CAF II eligible locations while allowing the funding to continue to be used to bring broadband to high-cost areas in Missouri. This approach is consistent with the deployment flexibility adopted by the Commission for CAF II, and it follows the approach taken with CAF I challenges. To do otherwise, would delay the promise of broadband for a number Missouri residents and, depending on the outcome of future auctions, could deprive them of this promise altogether.

Ms. Marlene H. Dortch  
October 1, 2015

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Pursuant to Section 1.1206(b) of the Commission's rules, a copy of this notice is being filed in the above-referenced dockets. Please contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeffrey D. Lanzetta". The signature is written in a cursive style with a horizontal line at the end.

Copies via email to:

Amy Bender  
Nicholas Degani  
Alexander Minard