



MONTANA
TELECOMMUNICATIONS
ASSOCIATION

October 29, 2015

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

In the Matters of:

Connect America Fund. WC Docket No. 10-90;
Lifeline Modernization. WC Docket No. 11-42;
E-Rate Modernization. WC Docket No. 13-184

Dear Ms. Dortch,

On October 27 and 28, 2015, I met with Amy Bender of Cmr. O'Rielly's staff, Travis Litman of Cmr. Rosenworcel's staff, and Stephanie Weiner of Chairman Wheeler's staff. I discussed issues relating to the above-referenced dockets.

With regard to the Connect America Fund, Montana's rural telecommunications providers urge the Commission to adopt specific, sufficient and predictable support for investment in broadband infrastructure in high cost areas, as provided in the Telecommunications Act. These companies are willing and able to invest in infrastructure capable of delivering speeds greater than the Commission's target speeds of 10 mbps upstream and 1 mbps downstream, given sufficient time and resources. Further, I reiterated the need for contributions reform, particularly given the increasing pressure on the high cost reform efforts caused by budgetary restraints and the shrinking contributions base.

Regarding Lifeline reform, the Montana Telecommunications Association (MTA) continues to assert that the level of support is more than sufficient for prepaid wireless Lifeline providers, who comprise the large majority of Lifeline providers. The current level of support, \$9.25 per subscriber, is sufficient to allow prepaid Lifeline providers to provide not only voice, but broadband capabilities to existing and future Lifeline subscribers. The Commission can expand Lifeline services, and reach more potentially eligible subscribers without spending any more on Lifeline support.

Finally, I reiterated MTA's longstanding opposition to using E-Rate funds to support self-construction of broadband networks by schools and libraries

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except under the most extenuating circumstances. Further, I conveyed the message that MTA has heard from rural schools that are concerned about the loss of voice service (POTS) as an eligible service under the E-Rate Reform Order. While VOIP may be a functional alternative to POTS, it is unclear whether a (standalone) broadband VOIP connection would be supported by high cost funds. If not supported, the unsupported VOIP line could end up costing the school more, even after accounting for the E-Rate discount.

Respectfully submitted,

/s/

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