



The voice of mid-size communications companies

November 5, 2015

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

**Re: *Ex Parte* Communication: WC Docket No. 10-90**

Dear Ms. Dortch:

On November 3, 2015, Ken Pfister of Great Plains Communications, Trey Judy of Hargray Communications, Wendy Fast of the Consolidated Companies, Cheryl Parrino of Parrino Strategic Consulting Group, and Micah Caldwell and the undersigned of ITTA met with Carol Matthey, Suzanne Yelen, Alex Minard, Katie King, and Chris Cook of the Wireline Competition Bureau to discuss matters in the above-captioned proceeding.

The subject of discussion focused on elements of proposed universal service reform for the rate-of-return industry. ITTA stated its ongoing support for the Commission's efforts to reform current rate-of-return USF support mechanisms consistent with stated Commission goals to distribute support equitably and efficiently based on forward-looking costs, to ensure no double recovery of costs, and to calculate support amounts that remain within the existing rate-of-return budget. ITTA expressed confidence that remaining open issues can be resolved in concert with industry and its view that the Commission can and should move forward expeditiously to adopt the reforms being contemplated.

More specifically, we discussed various elements of the voluntary model-based universal service support plan under consideration by the Commission. We addressed the proposed opt-in process for carriers choosing to participate in the model-based plan and urged the Commission to refrain from adopting a process that might incent some carriers to indicate a tentative decision to participate in the plan for the sole purpose of limiting the amount of support allocated to carriers that ultimately choose to participate. We discussed the broadband speed requirement that would apply to participating carriers and urged the Commission to adopt a 10/1 broadband speed standard for the entire ten-year term of the model-based plan. We expressed concern about how a speed standard that increased at some point during the term of the plan would be administered and how it would fit with the annual build-out milestones under consideration by the Commission. In addition, we stated that whatever speed standard is adopted by the Commission for participating carriers should also be used

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to determine the existence of unsubsidized competition. And we reiterated the importance of a process to ensure that representations by unsubsidized competitors regarding their ability to serve locations are fully vetted before areas are deemed ineligible for USF support.

We discussed how the build-out obligations for carriers participating in the model-based plan would be set and discussed whether and how the current broadband build-out level of a participating carrier should be taken into account in determining the number of locations the carrier is required to build out to under the plan. Finally, we discussed the transition plan that would apply for participating carriers that are eligible to receive less under the A-CAM than they receive under current legacy support mechanisms and urged the Commission to adopt a tired transition structure along the lines previously filed by ITTA.<sup>1</sup>

Please do not hesitate to contact the undersigned with any questions regarding this submission.

Respectfully submitted,



Genevieve Morelli  
President

cc: Carol Matthey  
Suzanne Yelen  
Alex Minard  
Katie King  
Chris Cook

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<sup>1</sup> Letter from Genevieve Morelli, ITTA, to Marlene H. Dortch, Federal Communications Commission, WC Docket No. 10-90, Attachment A (filed June 29, 2015).