

**HOME TELECOM**  
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November 10, 2015

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

**Re: *Connect America Fund, WC Docket No. 10-90***  
**Notice of *Ex Parte***

Dear Ms. Dortch

On November 8, 2015 the undersigned on behalf of Home Telecom (“Home”) met with Carol Matthey, of the Wireline Competition Bureau. General concerns associated the pending reforms related to rural rate of return carrier’s USF mechanisms were discussed. These concerns relate both to the ACAM under review as well as the mechanics associated with the proposed bifurcation plan.

Additional discussion focused on concerns related to the potential negative impact these reforms could have on the revenue flow of many small rural carriers. These are revenues these carriers depend upon to retire the cost of embedded plant and maintain network operations in high cost areas. A large decrease in existing funding could threaten the stability and viability of many small companies.

Regardless of the reform mechanism or mechanisms the Commission might deploy, all carriers should be allowed an appropriate transition period to modify operations to accommodate any support reductions. Given the continued uncertainty as to magnitude of the potential revenue dislocations and the critical importance of these revenue flows, consideration was requested for a stability mechanism similar to that employed for the phase down of existing inter-carrier compensation mechanisms as previously proposed by Home in this proceeding.

Should there be any questions concerning this matter, kindly contact the undersigned.

Respectfully submitted,

*/s/ Keith Oliver*

H. Keith Oliver  
Senior Vice President-Corporate Operations  
Home Telecom

cc: Carol Matthey