



Ross J. Lieberman
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November 25, 2015

VIA ECFS

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

Re: *Connect America Fund, WC Docket No. 10-90; High Cost Universal Service Support, WC Docket No. 05-337*

Dear Ms. Dortch:

The American Cable Association (ACA) has participated extensively in the Commission's efforts to reform its high-cost universal service programs and create the Connect America Fund. In its advocacy, ACA has adhered to several fundamental principles: support should not be provided where competitive alternatives exist; support should be provided efficiently; and overall funding for the program should be fiscally responsible, remaining within the current budget. Further, for those incumbent local exchange carriers subject to rate of return regulation, ACA has supported a more gradual transition since these carriers are smaller providers and often offer service only in some of the least dense areas of the country.

The Commission has been working for years to craft an appropriate transition for the rate of return carriers from the existing support mechanism to new methods for awarding support and to reform the support mechanism for Alaska. For the rate of return carriers, ACA understands that the Commission is considering a two-path approach for reforming the existing legacy system and also the option for carriers to move to a new mechanism where support would be awarded based on a cost model in exchange for a committed build-out of broadband facilities. With respect to Alaska, ACA understands all of the rate of return and competitive carriers in the state have developed a plan that provides stability, accountability, and better targets high-cost funding, without increasing overall support levels. ACA believes these approaches have merit so long as they are open and transparent, provide incentives to upgrade networks, avoid creating complexity and confusion, and award support efficiently within the current budget. Further, subject to the conditions described in the preceding sentence, ACA believes there is value in the Commission moving forward promptly to complete its work so that carriers can plan their investments and deploy higher-performance broadband networks.

Sincerely,

A handwritten signature in black ink, appearing to read "Ross J. Lieberman". The signature is fluid and cursive, with a large initial "R" and a long, sweeping underline.

Ross J. Lieberman

cc: Stephanie Weiner
Rebekah Goodheart
Nicholas Degani
Amy Bender
Travis Litman
Matthew DelNero
Carol Matthey