



The voice of mid-size communications companies

December 11, 2015

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

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

Dear Ms. Dortch:

On December 9, 2015, Micah Caldwell and the undersigned of ITTA met with Stephanie Weiner, Chairman Wheeler's Senior Legal Advisor, Wireline and Carol Matthey of the Wireline Competition Bureau to discuss matters in the above-captioned proceeding.

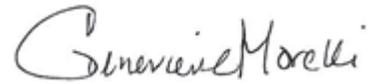
The discussion focused on elements of proposed universal service reform for the rate-of-return industry. ITTA stated its ongoing support for the Commission's efforts to reform current rate-of-return USF support mechanisms consistent with stated Commission goals. ITTA expressed confidence that remaining 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.

Consistent with prior advocacy, we discussed various elements of the voluntary model-based universal service support plan under consideration by the Commission. More specifically, we discussed the broadband speed requirement that would apply to participating carriers. We also addressed how the build-out obligations for carriers participating in the model-based plan would be set and 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 level of additional support dollars that should be incorporated annually into the model-based plan by the Commission.

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

Respectfully submitted,

A handwritten signature in cursive script that reads "Genevieve Morelli".

Genevieve Morelli
President

cc: Stephanie Weiner
Carol Matthey