



Competitive Carriers Association
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February 17, 2016

Via ECFS

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

Re: NOTICE OF EX PARTE
WT Docket No. 10-208: *Universal Service Reform - Mobility Fund*

Dear Ms. Dortch:

On February 12, 2016, Steven Berry, Tim Donovan, Courtney Neville, and I met with Stephanie Weiner, Wireline Legal Advisor to Chairman Wheeler and Jim Schlichting and Sue McNeil of the Wireless Telecommunications Bureau regarding the above-referenced proceeding. During the meeting, Competitive Carriers Association (CCA) expressed support for the Federal Communications Commission's (FCC or Commission) efforts to reform the Universal Service Fund (USF) to preserve and expand consumer-demanded wireless services in rural America. CCA reiterated that it shares the Commission's goals of modernizing the high-cost program, including the Mobility Fund, and connecting unserved and underserved parts of the country, while maintaining fiscal responsibility and keeping the program on a budget for the benefit of American consumers. In our meeting, CCA and the Commission discussed the Consolidated Appropriations Act of 2016, CCA's recent testimony before the Senate Committee on Commerce, Science, and Transportation Subcommittee on Communications, Technology, Innovation and the Internet entitled "Ensuring Intermodal USF Support for Rural America,"¹ the benefits and challenges of creating a new Mobility Fund II, and the "Alaska Plan" put forth by several CCA members.

Highlighting our members' USF priorities, CCA discussed language included in the Consolidated Appropriations Act of 2016 (Act).² CCA explained that Section 631 of the Act prohibits the FCC from phasing out legacy high-cost support absent implementation of a Mobility Fund II program. Consistent with the Commission's *Transformation Order*,³ however, CCA also

¹ See *Ensuring Intermodal USF Support for Rural America Before the S. Comm. on Commerce, Sci., and Transp. Subcomm. on Commc'n's, Tech., Innovation, and the Internet*, 114th Cong. (2016)(statement of Steven K. Berry, CEO & President of Competitive Carriers Association), a copy of which is attached to this correspondence.

² Consolidation Appropriations Act of 2016, Pub. L. No. 114-113 (2015).

³ *Connect America Fund*, WC Docket No. 10-90; *A National Broadband Plan for Our Future*, GN Docket No. 09-51; *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135; *High-Cost Universal Service Support*, WC Docket No. 05-337; *Developing an Unified Intercarrier Compensation Regime*, CC

emphasized the Commission’s authority to consider, develop, or adopt other support mechanisms as an alternative to Mobility Fund II.

Specifically, CCA discussed the possibility of creating a new Mobility Fund II.⁴ CCA’s Mobility Fund II proposal encourages a program established with a sufficient budget consisting of targeted support to preserve existing service while also expanding mobile broadband where services are unavailable.⁵ To more accurately identify which areas would be eligible for expansion support, CCA and the Commission also discussed the possibility of creating a new methodology to determine which portions of the country qualify as “served,” versus those that remain unserved or underserved.⁶

CCA expressed continued support for the Commission’s overarching goals of ensuring universal availability and maintenance of modern wireless networks capable of providing advanced mobile broadband service to all Americans. Likewise, CCA also expressed support for the Alaska Plan proposal recently submitted by CCA members including General Communication, Inc., Bristol Bay Telephone Cooperative, Copper Valley Telecom, and TelAlaska.⁷ The Alaska Plan dovetails with the FCC’s and CCA’s goals for USF reform including creation of a plan that is simple and implementable, provides stability for participating carriers, improves targeting high-cost support, and generates mobile broadband deployment benefits.

Docket No. 01-92; *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45; *Lifeline and Link-Up*, WC Docket No. 03-109; *Universal Service Reform – Mobility Fund*, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 ¶ 1121 (rel. Nov. 18, 2011) (“*Transformation Order*”).

⁴ *Id.*

⁵ *See Ex Parte* Letter from Rebecca Murphy Thompson, General Counsel, CCA to Marlene H. Dortch, Secretary, FCC, WT Docket No. 10-208 (filed Nov. 16, 2015).

⁶ *See Berry*, *supra* note 1.

⁷ *See Ex Parte* Letter of Christine O’Connor, Executive Director, Alaska Telephone Association and John T. Nakahata, Counsel for General Communication, Inc. to Marlene H. Dortch, Secretary, FCC, WT Docket No. 10-208 (filed Oct. 22, 2015).

This *ex parte* notification is being filed electronically with your office pursuant to Section 1.1206 of the Commission's Rules. Please do not hesitate to contact me with any questions or concerns.

Sincerely,

/s/ Rebecca Murphy Thompson

Rebecca Murphy Thompson, EVP & General
Counsel
Competitive Carriers Association

cc (via email): Sue McNeil
Jim Schlichting
Stephanie Weiner

Attachments (1)