



Advocates for Rural Broadband

Paul Kelly  
President

Kelly Worthington  
Executive Vice President

May 10, 2016

**Filed Via ECFS**

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

**RE: *Connect America Fund*, WC Docket No. 10-90**

Dear Ms. Dortch:

On Friday, May 6, 2016, Mark Gailey of Totah Communications, Inc.; Bob DeBroux of TDS Telecom; and Derrick Owens and Gerry Duffy representing WTA – Advocates for Rural Broadband (“WTA”) met via telephone conference call with Carol Matthey, Alexander Minard and Suzanne Yelen of the Wireline Competition Bureau, to discuss Paragraph 69 and Footnote 141 of the Report and Order, Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking, FCC 16-33, released March 30, 2016, in this proceeding, WC Docket No. 14-58 and CC Docket No. 01-92.

WTA inquired as to how the second step of the Alternative Connect America Cost Model (“ACAM”) election process and related budget modifications would work with respect to carriers that initially selected an ACAM support offer which was less than the support they received from the legacy mechanisms in 2015, but then subsequently declined to accept a revised ACAM offer. WTA expressed general concern that some options for dealing with this situation would reduce the overall budget for all carriers remaining on the Rate of Return Path, and thereby penalize carriers that had not selected, or could not select, the Model-Based Path, and that had not participated in the actions of those carriers that had opted into, and then out of, the ACAM support offers. After discussion of various rationales and options, WTA did not propose a specific alternative.

Pursuant to Section 1.1206(b) of the Commission's Rules, this submission is being filed for inclusion in the public record of the referenced proceeding.

Respectfully submitted,

/s/ Gerard J. Duffy

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