



1634 Eye Street NW, Suite 510  
Washington, D.C. 20006

Jeffrey E. Dupree  
Vice President  
Government Relations  
PH 202-682-2495  
FX 202-682-0154  
[jdupree@neca.org](mailto:jdupree@neca.org)

June 13, 2016

***Ex Parte Notice***

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

**Re: *Connect America Fund, WC Docket No. 10-90; ETC Annual Reports and Certifications, WC Docket No. 14-58; Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92***

Dear Ms. Dortch:

On June 10, 2016, Jim Frame, Jeff Phillips, John Ricker, Jeff Bodyfield and the undersigned on behalf of NECA spoke via conference call with Joseph Sorresso, Douglas Slotten, Ted Burmeister and Ed Krachmer of the Wireline Competition Bureau to respond to questions regarding the method for determining broadband-only loop investment and expenses. In particular, questions were related to the methodology proposed by NTCA in its recent petition for reconsideration in the above-referenced docket. *See* Petition for Reconsideration and/or Clarification of NTCA, WC Docket Nos. 10-90 and 14-58, CC Docket No. 01-92 (filed May 25, 2016), at 9, n.18.

NECA staff discussed the various cost allocation methods for assigning broadband-only loop investment and expenses in existing Parts 36 and 69 rules, as well as some of the analyses required to isolate costs specifically for broadband-only loop costs, consistent with the methodology proposed by NTCA. NECA staff also responded to questions regarding the need to modify the corporate operations expense limitation calculation to include broadband-only loop counts.

Pursuant to section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS.

Sincerely,

A handwritten signature in black ink that reads "Jeffrey E. Dupree". The signature is written in a cursive, flowing style.

cc: Joseph Sorresso  
Douglas Slotten  
Ted Burmeister  
Ed Krachmer