NATIONAL TELECOMMUNICATIONS COOPERATIVE ASSOCIATION
The Voice of Rural Telecommunications
www.ntca.org

June 12, 2002

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street S.W., TW-A325
Washington, D.C. 20554

Re: *Ex Parte* Notice
Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Amendment of Part 1 of the Commission's Rules Competitive Bidding Procedures, WT Docket No. 97-82; and Rural Health Care Support Mechanism, WC Docket No. 02-60

Dear Ms. Dortch:

On Tuesday, June 11, L. Marie Guillory, Vice President of Legal and Industry and Jill Canfield, Regulatory Counsel, for the National Telecommunications Cooperative Association met with Jordan Goldstein, Senior Legal Advisor to Commissioner Michael J. Copps.

The group discussed NTCA's recent filings regarding support for changing the definition of universal service to include equal access. The NTCA representatives also discussed the Rural Task Force's Order that adjusted the cap on the High Cost Fund. We explained that all numerical analysis supporting the Rural Task Force Order assumed rebasing effective January 1, 2001, but that did not happen. Thus the 2002 cap is much lower than intended. We also talked generally about the Rural Health Care proceeding and the Commission's reasons for re-examining the rules. The NTCA representatives also talked about the Commission's current attribution rules. We explained how the rules attribute the outside income of a director of a cooperative to the cooperative for purposes of determining whether the cooperative qualifies of an auction bidding credit and that this is inconsistent with the cooperative model.

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In accordance with the FCC's rules, an original and two copies of this letter are being filed with the Secretary's office. If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

/s/ Jill Canfield
Jill Canfield
Regulatory Counsel

cc: Jordan Goldstein, FCC

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