



March 26, 2009

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

Ex Parte Notice

**Re: Comment Date Established for Report on Comprehensive Rural Broadband Strategy
GN Docket No. 09-29**

Dear Ms. Dortch:

On March 26 2009, the undersigned met with William Kehoe, Melissa Kirkel, and Jennifer Prime of the Wireline Competition Bureau; Charles Mathias and Christine Clearwater of the Wireless Telecommunications Bureau; and Shana Barehand of the Consumer & Government Affairs Bureau. The meeting was held pursuant to the Commission's Public Notice in the above-captioned docket.¹

Participants discussed how specific Federal agency programs and resources can best respond to rural broadband requirements and overcome obstacles that currently impede rural broadband deployment. Specifically, the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO) recommends that a rural broadband strategy include adding broadband to the list of services supported by the Universal Service Fund; ensuring that rural carriers have affordable and nondiscriminatory access to the Internet backbone; reforming retransmission consent and other video access rules; and continuing to improve coordination among federal agencies. A one-page summary of these items was provided to staff and is included below.

In accordance with FCC rules, this letter is being filed electronically in the above-captioned docket.

¹ *Comment Date Established For Report on Rural Broadband Strategy*, GN Docket No. 09-29, Public Notice, DA 09-561 (rel. Mar. 10, 2009) (Public Notice), p. 2.

Sincerely,

/s/ Stephen Pastorkovich

Stephen Pastorkovich
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cc: Shana Barehand
Christina Clearwater
William Kehoe
Melissa Kirkel
Charles Mathias
Jennifer Prime



A Comprehensive Rural Broadband Strategy Should Include The Following:

- Broadband should be added to the list of services included in the rural High-Cost support program, and the cap on high-cost loop support should be lifted.
 - The Identical Support Rule should be eliminated.
 - The base of contributors should be expanded to all broadband providers.
- To serve consumers as bandwidth demand grows, rural ILECs need affordable, non-discriminatory access to the Internet backbone.
- Because broadband and video demand are linked, demand can be stimulated by undertaking a market-based reform of retransmission consent rules, ending forced tying, closing the terrestrial loophole, and reforming similar video access rules.
- Federal agencies should continue to coordinate broadband programs and initiatives, such as by sharing information without exposing proprietary data, and by uniformly applying reasonable reporting and compliance requirements that are not overly burdensome.