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Electronic Submission

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

Re: Connect America Fund, WC Docket No. 10-90; High-Cost Universal Service Support, WC Docket 05-337; A National Broadband Plan for Our Future, GN Docket 09-51

Dear Ms. Dortch,

On June 15, 2010, Cathy Carpino, Mike Lieberman, Joel Lubin, Mary Henze, David Hostetter, and Matt Terrell, all of AT&T, met with Steve Rosenberg of the Wireline Competition Bureau and Robert Curtis, Rohit Dixit, Joseph Soban, and Kevin King of the Office of Strategic Planning and Policy Analysis.

The purpose of the meeting was to discuss a number of issues regarding the Broadband Assessment Model (BAM). In particular, so that interested parties may comment meaningfully on the merits of using the BAM (or a modified version thereof) for the Connect America Fund, AT&T inquired about the FCC's plans for releasing a working version of the Model. Staff responded that they are actively working on making the BAM available for public use with a target completion date of late Summer. The rest of the discussion focused on the questions contained in the attached document.

This notice is being filed pursuant to Sec. 1.1206(b)(2) of the Commission's rules. If you have any questions concerning this filing, please do not hesitate to contact me at 202-457-2041.

Sincerely,

/s/

Mary L. Henze

cc: S. Rosenberg J. Soban
R. Curtis K. King
R. Dixit

BAM Discussion Points

1. Administrative. We appreciate the data that has been made public so far. Do you have a process for notifying the public when new data is released/posted? If so, what is it and if not, please create one! What are the FCC's plans for releasing additional background material (e.g., inputs,) for the BAM? So that interested parties may comment meaningfully on the merits of using the BAM or a modified version thereof in the CAF, what are the plans for releasing or making available a "run-able" version of the BAM and/or its sub-modules?

2. Next Steps. Commissioner Clyburn stated publically last week the estimate of broadband un-served population has increased from 14 million to over 20 million. Can you explain and/or clarify this statement? Have you rerun the BAM with new inputs? Are there plans for continuing to refine and adjust the model structure and/or inputs? Are there plans for updating the BAM by incorporating the NTIA/RUS mapping data? What is the timeframe for updating the BAM and how will this process be managed and made transparent?

3. BAM Characteristics. The documentation suggests that the BAM can be run in a variety of ways. We would like to know more about how flexible the BAM is.

- For example, in the Model Documentation you note that the user "has substantial flexibility to aggregate CB into their preferred geographic region of most relevance (e.g., BEA region, county, or state)". Can the BAM also aggregate/disaggregate at other geographic levels such as distribution area, wire center, or census tract?
- We understand Module 1 can be run for incremental (ILEC) or total (CLEC) investment. When Module 1 is run in CLEC mode what affect does that have on the other modules? For example, how is voice revenue handled? Have you run the entire BAM in CLEC mode?

4. DSL Technology. Which standards were relied upon to determine rate and reach of ADSL2+? The documentation refers to "11,000 to 12,000" as criteria; how was this applied? Did your rate and reach assumptions reflect pair-bonding? What standards did you apply in order to declare a geographic area 4/1 capable? For example, what percentage of the HUs had to be reached for the entire area to be deemed 4/1 capable? What type of "real world" adjustments did you or do you plan to consider in Module 1 that could change the cost analysis (e.g., the presence or absence of other DSL or high capacity services in the same sheath, the existence of 26 AWG copper cable from the central office).

5. Geography. We understand the Availability Gap was calculated based on the roll up of CB results to the county level. What was the rationale behind the choice of county? Did you consider other levels? Did you calculate the Gap at any other geographic level?