



NATIONAL TELECOMMUNICATIONS COOPERATIVE ASSOCIATION

The Voice of Rural Telecommunications

www.ntca.org

September 30, 2010

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

Ex Parte Notice

A National Broadband Plan for Our Future, GN Docket No. 09-51; Connect America Fund, WC Docket No. 10-90; High-Cost Universal Service Support, WC Docket No. 05-337; Developing a Unified Intercarrier Compensation Regime, CC Docket 01-92

Dear Ms. Dortch:

On Wednesday, September 29, 2010, Dale Jones of Tri-County Telephone Association, Brian Boisvert of Wilson Telephone Company, Inc., Mike Murphy and Tonya Murphy of Gorham Telephone Company, Rob Koch of H&B Communications, David Rosenthal of the Kansas Telecommunications Industry Association, Archie Macias of Wheat State Telephone Company, and Zachariah Odell of South Central Telephone Association (collectively, the “Rural Companies”), along with Steve Pastorkovich of OPASTCO, Derrick Owens of WTA, and the undersigned, met with Carol Matthey, Amy Bender, and Elise Kohn (via telephone) of the Wireline Competition Bureau and Michael Steffen of the Office of General Counsel.

The Rural Companies emphasized the importance of sustained universal service support and the success of the rate-of-return regulatory framework in enabling both the deployment and ongoing operation of broadband networks in rural areas. The Rural Companies explained how their deployment of fiber-based networks has proven cost-effective and efficient, and helps to achieve the broadband objectives contemplated in the National Broadband Plan – particularly given the limited capabilities of existing decades-old copper plant and the expansive nature of their rural serving areas. Finally, as part of any reform, the Rural Companies urged the Commission to ensure accountability in the use of universal service funds for network investment and satisfaction of provider-of-last-resort obligations in rural areas.

The Rural Companies also met on Wednesday, September 29, 2010 with Rebekah Goodheart and Randy Clarke of the Wireline Competition Bureau to discuss intercarrier compensation reform. The Rural Companies urged the Commission to take near-term steps to clarify that all providers using the PSTN to originate and/or terminate calls must pay the applicable intercarrier compensation rates, regardless of technology, and to strengthen call signaling rules to address “phantom traffic.” The Rural Companies also discussed the steps that the Kansas Corporation Commission has taken already to unify intrastate and interstate switched access rates and to establish a state universal service fund.

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Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS with your office. If you have any questions, please do not hesitate to contact me at (703) 351-2016 or mromano@ntca.org.

Sincerely,

/s/ Michael R. Romano
Michael R. Romano
Senior Vice President - Policy

MR:rhb

cc: Carol Matthey
Amy Bender
Elise Kohn
Michael Steffen
Rebekah Goodheart
Randy Clarke