



November 19, 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

Applications of Comcast Corporation, General Electric Company and NBC Universal, Inc. for Consent to Assign Licenses or Transfer Control of Licenses, MB Docket No. 10-56

Comment Sought on Petition for Rulemaking to Amend the Commission's Rules Governing Retransmission Consent, MB Docket No. 10-71

Dear Ms. Dortch:

On Thursday, November 18, 2010, David Herron, Chief Executive Officer and General Manager of West Carolina Rural Telephone Cooperative (“WestCarolinaTel”), Shannon Butler, External Affairs/Governmental Relations Manager of WestCarolinaTel, Steve Fravel, Manager-Video Services of the National Telecommunications Cooperative Association (“NTCA”), and the undersigned met with David Grimaldi, Angela Kronenberg, Louis Peraertz, and Alex Reynolds from the Office of Commissioner Mignon Clyburn to discuss WestCarolinaTel’s operations and serving area and its concerns with respect to certain broadband and video-related regulatory issues.

WestCarolinaTel discussed the nature and reach of the robust network it has deployed in rural South Carolina. WestCarolinaTel explained that its efforts at network deployment have been aimed at installing a network that is capable of delivering high-quality services for its consumers today and in the future. This carefully planned network deployment has allowed WestCarolinaTel to offer high-speed Internet access services that are already in significant demand by consumers, and it has also enabled WestCarolinaTel to stand ready to accommodate greater speeds over time at lower cost and with much less effort as demand increases consistent with the expectations of the National Broadband Plan.

WestCarolinaTel also discussed how video services have helped to promote adoption of its broadband services, leading to a dramatic increase in the “take rate” of higher-speed services

(*e.g.*, between 6 Mbps downstream and up to 10 Mbps downstream) by consumers in less than two years. WestCarolinaTel explained, however, that the terms and conditions under which it obtains broadcast and other programming content negatively affect the provision of such video services. In particular, tying and bundling arrangements between broadcast content and other video or even online content impose substantial costs on WestCarolinaTel's video operations and limit its ability to manage its channel line-up. To address such concerns, particularly as they relate to and could be exacerbated by the pending Comcast-NBCU merger, WestCarolinaTel urged that the Commission at the very least impose conditions on the merger consistent with those recommended in prior filings in MB Docket No. 10-56 by NTCA and the American Cable Association, and also that the Commission amend its retransmission consent rules consistent with the recommendations of NTCA and other associations in prior filings in MB Docket No. 10-71.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS with your office. A copy of a South Carolina service map circulated at the meeting is included with this letter. 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

MRR:rhb

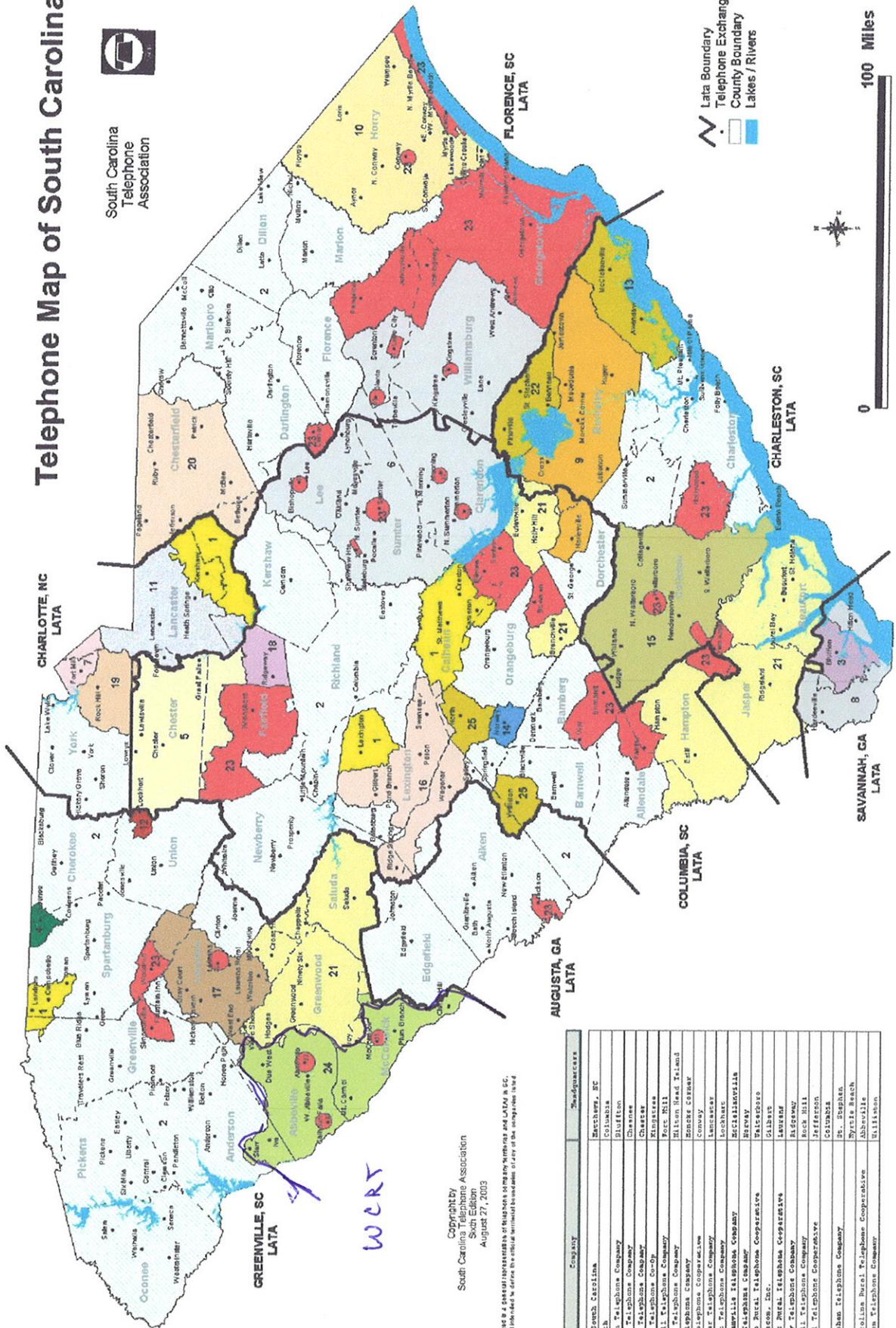
Enclosure

cc: David Grimaldi
Angela Kronenberg
Louis Peraertz
Alex Reynolds

Telephone Map of South Carolina



South Carolina Telephone Association



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South Carolina Telephone Association
Sixth Edition
August 27, 2003

REFERRED TO A SPECIAL REPRESENTATIVE OF TELEPHONE COMPANIES IN SC AND LATA'S & SC.
It is not intended to serve the official technical functions of any of the companies listed.

Area	Company	Subdivisions
1	AT&T	Greenville, SC
2	South Carolina Telephone Association	Charleston, SC
3	Charter Telephone Company	Bluffton
4	Charter Telephone Company	Charleston
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