



The Voice of Rural & Regional Carriers

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December 8, 2010

**Via ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 10-90; WC Docket No. 05-337  
GN Docket No. 09-51**

Dear Ms. Dortch:

On December 7, 2010, RCA, including Steven Berry; Tim Donovan; Bob Koppel with Lukas, Nace, Gutierrez & Sachs; and the undersigned, and several of RCA's carrier and associate members, including Johnie Johnson and Brian Spurgeon, Nex-Tech Wireless; Gwen Donaldson, representative for Nex-Tech Wireless; Doug Minster, Atlantic Tele-Network; Chuck Willis, Bluegrass Cellular; Mitch Rose and Kevin Joseph, representatives for Cellular South; Ed King, Cellular Properties; Nash Neyland, Cavalier Wireless, LLC; and David Peters, Velleros; met with Jennifer Flynn to discuss implementation of the FCC's Universal Service Fund (USF) reform recommendations in the National Broadband Plan.

At the meeting, RCA outlined its critical public policy objectives for Universal Service reform summarized in the attached document, copies of which were distributed during the meeting. In addition to RCA's public policy principles, RCA members discussed how they are currently using USF to deploy advanced services to rural and regional areas that, without support, would not be served today. RCA members personalized how the USF reform could impact their current and future business plans, and how phasing down USF support will negatively impact rural and regional carriers and the consumers they serve.

RCA fully supports the FCC's goal, as outlined in the National Broadband Plan, to accelerate investment in broadband infrastructure and make broadband services more accessible throughout the United States, particularly for people living in rural and insular, high-cost areas, tribal lands, and for low-income Americans. Mobile broadband is a critical ingredient for improving and enhancing the lives of all Americans. Consumers are increasingly choosing wireless technology as their primary mode of communications.<sup>1</sup> This choice must be reflected in the FCC's USF reform. A success-based funding model will ensure that funding is provided to those carriers that construct facilities and acquire customers, while providing cost-saving measures to decrease the size of the fund.

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<sup>1</sup> *Telecommunications: Enhanced Data Collection Could Help FCC Better Monitor Competition in the Wireless Industry*; GAO, Report to Congressional Requesters; GAO-10-779 (July 2010).

This *ex parte* notification is being filed electronically with your office pursuant to Section 1.1206 of the Commission's Rules.

Sincerely,

A handwritten signature in black ink, appearing to read 'R.M.T.', with a large, stylized flourish extending to the right.

Rebecca Murphy Thompson  
General Counsel

cc: Jennifer Flynn