



National Cable & Telecommunications Association
25 Massachusetts Avenue, NW – Suite 100
Washington, DC 20001
(202) 222-2300
www.ncta.com

Jennifer K. McKee
Vice President and Associate General Counsel

(202) 222-2460
(202) 222-2446 Fax

June 8, 2011

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

**Re: Implementation of Section 224 of the Act, WC Docket No. 07-245
A National Broadband Plan for Our Future, GN Docket No. 09-51**

Dear Ms. Dortch:

On June 7, 2011, I spoke via phone with Julie Veach of the Office of General Counsel to discuss the Commission's April 7, 2011 pole attachment report and order in the above-referenced dockets. I reiterated NCTA's support for the Commission's decision and legal authority to amend the rate formula for pole attachments by telecommunications carriers so that it generally will recover the same portion of pole costs as the current cable rate. I also discussed NCTA's concern that the Commission's rules were not sufficiently clear to achieve this result in cases where the presumed number of attaching entities is rebutted by the pole owner and suggested that the Commission could address this concern by specifying cost allocators based on the number of attaching entities, or by adopting the cable rate as proposed in the May 10, 2010 further notice of proposed rulemaking.

Respectfully submitted,

/s/ Jennifer McKee

Jennifer K. McKee

cc: J. Veach