



July 8, 2011

***Ex Parte Notice***

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

**Re:** *Connect America Fund, WC Docket, No. 10-90, National Broadband Plan for Our Future, GN Docket No. 09-51, Establishing Just and Reasonable Rates for Local Exchange Carriers, 07-135, High-Cost Universal Service Support, WC Docket No. 05-337, Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92*

Dear Ms. Dortch:

On July 6, 2011, Michael Romano and the undersigned of the National Telecommunications Cooperative Association (NTCA), Jeff Dupree of the National Exchange Carrier Association (NECA), John Rose and Stuart Polikoff of the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO), Derrick Owens of the Western Telecommunications Alliance (WTA), Gerard Duffy, counsel to WTA, Ron Laudner of OmniTel Communications, and Roger Nishi of Waitsfield Champlain Telephone (via telephone) (collectively, the Rural parties) met with Zachary Katz of Chairman Genachowski's office, Michael Steffen of the Office of General Counsel, Sharon Gillette, Carol Matthey, Albert Lewis Patrick Halley, and Amy Bender of the Wireline Competition Bureau, and Margaret Wiener of the Wireless Telecommunications Bureau, to discuss the above-captioned dockets.

The Rural parties discussed the need to ensure sufficient cost recovery to promote and sustain broadband availability and affordability in rural areas in a manner that recognizes the varied characteristics among carriers serving those areas. The Rural parties reiterated that the RLEC Plan (filed April 18, 2011) should serve as the basis for reform, and expressed the Rural parties' active and ongoing commitment to working with other industry parties toward appropriate and responsible USF and ICC reform. While contemplating reform of existing high cost recovery mechanisms, the Rural parties discussed: the need for adequate transition periods and reasonable transition paths; management of fund growth without impairing reasonable cost recovery; the role of rate benchmarks; and thorough identification and recognition of consumer impacts. The Rural parties emphasized the need to evaluate any industry proposals fully in order to assess potential impacts on consumers and the industry participants who serve them.

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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.

Please do not hesitate to contact me at (703) 351-2035 or [jseidemann@ntca.org](mailto:jseidemann@ntca.org) if you have any questions or require additional information.

Respectfully submitted,

/s/ Joshua Seidemann

Joshua Seidemann

Director of Policy

JS:rhb

cc: Zachary Katz  
Michael Steffen  
Sharon Gillette  
Carol Matthey  
Albert Lewis  
Patrick Halley  
Amy Bender