



July 18, 2011

Marlene Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

*Notice of Ex Parte*

**WC Docket Nos. 10-90, 07-135, 05-337 and 03-109, GN Docket No. 09-51 and CC Docket Nos. 01-92 and 96-45; Connect America Fund, a National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Support, Developing a Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-up**

Dear Ms. Dortch:

On July 14, 2011, Max Huffman of INDATEL Group and the undersigned (collectively, NTCA) met with Daniel Ball, Patrick Halley, Katie King, Kevin King, Gary Siegel and Rafi Malosney of the Wireline Competition Bureau. The attached presentation served as the basis for discussion.

The purpose of these meetings was to explore what conditions may (or may not) be conducive to the combination of resources by and among carriers. Accordingly, NTCA first described INDATEL members' collaborative efforts that leverage network assets and common business interests. As demonstrated in the attached presentation, the rural local exchange carriers (RLECs) that form the basis of INDATEL members have created statewide fiber ring networks in 22 states that provide, *inter alia*, shared backbone "middle mile" deployments as well as critical wireless backhaul capabilities across the country. These networks include recipients of RUS Broadband Pilot Loans.

In addition to describing instances in which the RLECs obtained efficiencies through combination or sharing of resources, NTCA described instances in which where efficiencies were perceived initially, but rejected once further examination revealed shortfalls or inefficiencies. NTCA explained that some factors, such as geographic and terrain challenges, may act as a restrainer to deploying shared network facilities or undertaking efforts in combination. In sum, the discussion developed the proposition that RLECs are aggressively developing collaborative efforts where those opportunities permit; where conditions support deployment; and where access to capital is available.

Ms. Marlene H. Dortch

July 18, 2011

Page 2

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

cc: Daniel Ball  
Patrick Halley  
Katie King  
Kevin King  
Gary Siegel