

September 9, 2011

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

**Re: Connect America Fund, WC Docket No. 10-90; A National Broadband Plan for Our Future, GN Docket No. 09-51; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 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:

Various parties have expressed interest in gaining access to the CostQuest Associates Broadband Analysis Tool (“CQBAT”) that was used for the America’s Broadband Connectivity Plan (“ABC Plan”) filing on July 29, 2011. The ABC Plan Coalition fully supports robust public access to modeling data, and it submits this filing to describe efforts being made to ensure transparency.

As of September 9, 2011, the ABC Plan Coalition will offer all interested parties free online access to CQBAT results. The application is tested and optimized to work with Internet Explorer, Versions 8 and 9. A user manual and webinar providing information regarding the operation of CQBAT also will be made publicly available.

With this online access, users will be able to generate CQBAT reports based upon input data filed by the ABC Plan Coalition in an ex parte submitted on August 19, 2011. Users will be able to test the sensitivities of applying various support parameters, including the following:

- **Total Max Funding** - The total maximum high cost support available.
- **Target Benchmark** - The cost benchmark to which a candidate area’s per subscriber support is compared to determine where high-cost funding is required.
- **Alternative Technology Cutoff** - The input value representing the high-cost support limit or alternatively the cost increase over the Target Benchmark. If the candidate area’s cost per subscriber is greater than the Target Benchmark plus the Alternative Technology Cutoff, the number of service locations in the candidate area is excluded from support and presumed to be served by an alternative broadband technology, such as satellite. A similar term, Alternative Technology (Cost) Threshold represents the entire cost threshold. In other words, Alternative Technology (Cost) Threshold equals the Alternative Technology Cutoff plus the Target Benchmark. The Alternative Technology Cutoff can be modified in CQBAT. Alternative Technology (Cost) Threshold is a descriptive term used in other documentation.
- **FCC Portion of Total Funding** - The proportion of high cost funding under the jurisdiction of the FCC.

- **Monthly Support Funding Cap** - A cap on the monthly high-cost support available for a candidate area. For subscribers whose costs are beyond the Benchmark plus Monthly Support Funding cap, the high-cost support (support is defined by the amount of cost exceeding the benchmark value) for the subscriber would be limited to the Monthly Support Funding Cap.
- **Mark with Provider** - A reporting filter, wherein reporting results shown are only those of the company associated with that user account.
- **Cable Unserved** - A toggle used to include or exclude cable-served areas in the analysis.

Users also may generate reports for different levels of geography:

- **Census Designated Place** - A geographic entity that serves as the statistical counterpart of an incorporated place for the purpose of presenting census data.
- **Census Block Group** - A census block group (BG) is a cluster of census blocks having the same first digit of their four-digit identifying numbers within a census tract.
- **Census Tract** - A census tract represents a small, relatively permanent statistical subdivision of a county.
- **Company** - An abbreviation of the name corresponding to the 14 largest (by line count) incumbent local exchange carriers (“LECs”). If not named, designated as small (SML).
- **County** - The primary legal divisions of most states are termed counties. If a state or territory doesn’t have counties, the statistical equivalent area (e.g., Borough, Parrish) is used.
- **OCN** - Operating Company Number based upon the TANA 2010 wire center boundary wire center to OCN association as well as corrections from Coalition companies.
- **SAC** - Study Area Code identifying a collection of Study Areas as described by the Universal Service Administrative Company (USAC).
- **Service Area** - An area corresponding to the serving wire center boundary of an incumbent LEC.

Parties seeking access to the model shall sign and date an acknowledgment agreeing to be bound by the terms and conditions of the Supplemental Protective Order, and sign and date a Licensing Agreement agreeing to be bound by the terms and conditions of the Licensing Agreement. These can be found in the September 9, 2011 FCC Supplemental Protective Order that was entered in these dockets. Upon receipt of a signed acknowledgement and Licensing Agreement CostQuest will, pursuant to the terms of the Supplemental Protective Order, provide a login and password that will enable access to CQBAT over the Internet.

Sincerely,

*/s/ Mike Lieberman*  
 Mike Lieberman  
 Executive Director  
 Public Policy  
 AT&T

*/s/ Michael D. Saperstein, Jr.*  
 Michael D. Saperstein, Jr.  
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*/s/ Jeffrey S. Lanning*  
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*/s/ Maggie McCready*  
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*/s/ Michael T. Skrivan*  
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