



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

www.ncta.com

Neal M. Goldberg
Vice President and General Counsel

(202) 222-2445
(202) 222-2446 Fax

September 13, 2011

EX PARTE

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 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; Federal-State Joint Board on Universal Service, CC Docket No. 96-45

Dear Ms. Dortch:

On September 9, 2011, Michael Powell, President and CEO of the National Cable & Telecommunications Association (NCTA), met with Chairman Julius Genachowski to discuss universal service high-cost support and intercarrier compensation reform. Mr. Powell commended the Commission's stated intent to (1) modernize both regimes for broadband; (2) exert fiscal responsibility; (3) require accountability of recipients; and (4) employ market-driven mechanisms. Mr. Powell further stated that the recent proposal submitted by a group of incumbent phone companies, the "ABC Plan," includes some useful concepts, but wholesale adoption of that proposal would not serve the public interest. Mr. Powell stressed that the Commission's reform efforts should include the following:

- Meaningful, enforceable fiscal constraints in the form of a cap on high-cost support;
- Competitive and technological neutrality, rather than adopting those ABC Plan proposals that favor incumbent phone companies;
- Legal certainty regarding the ability of providers to receive compensation for terminating calls, regardless of the technology used by the end user of the call.

Respectfully submitted,

/s/ **Neal M. Goldberg**

Neal M. Goldberg

cc: J. Genachowski