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September 20, 2011

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
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 behalf of the National Cable & Telecommunications Association (NCTA), James Assey, Steve Morris and I met with Zac Katz, Chief Counsel and Senior Legal Advisor to Chairman Genachowki, and Sharon Gillett, Carol Matthey, and Rebekah Goodheart of the Wireline Competition Bureau to discuss issues related to the above-captioned dockets. We urged the Commission to expeditiously reform the universal service high-cost support and intercarrier compensation mechanisms. Specifically, we stated that the Commission should adopt meaningful, enforceable fiscal constraints in the form of a cap on high-cost support; should ensure that its reforms are competitively and technologically neutral, rather than adopting proposals that favor incumbent phone companies; and should provide certainty regarding the ability of providers to receive compensation for terminating calls, regardless of the technology used by the end user of the call. We also discussed the certification process for recipients of high-cost support, including the obligations associated with an Eligible Telecommunications Carrier designation. We further discussed state-imposed Carrier of Last Resort voice telephone service obligations, and argued that such obligations should not be used as the basis for distributing federal broadband funding.

Respectfully submitted,

Jennifer K. McKee

cc: Z. Katz, S. Gillett, C. Matthey, R. Goodheart