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October 18, 2011

Via ECFS

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

Re: American Cable Association (“ACA”) and National Cable & Telecommunications Association (“NCTA”) *Ex Parte* Presentation; *In the Matter of Connect America Fund, WC Docket No. 10-90 et al.*

Dear Ms. Dortch:

On October 14, 2011, Steve Morris and Jennifer McKee of the National Cable & Telecommunications Association, Matt Polka and Ross Lieberman of the American Cable Association (“ACA”), and the undersigned, Thomas Cohen of Kelley Drye & Warren LLP on behalf of ACA, had a telephone conversation with Zac Katz, Chief Counsel and Senior Legal Advisor to Chairman Genachowski and Michael Steffen of the Office of General Counsel to discuss issues related to the above-captioned dockets. We discussed the Commission’s proposals to reform the universal service high-cost support mechanism and the intercarrier compensation regime.

Specifically, Mssrs. Katz and Steffen responded to questions about the Chairman’s proposed rules for distribution of universal service broadband funding. These questions focused on (1) distribution of support in areas served by price cap incumbent local exchange carriers (“ILECs”) prior to the establishment of the Connect America Fund (“CAF”), (2) distribution of CAF support through a right of first refusal for price cap ILECs, and (3) distribution of CAF support through competitive bidding by eligible providers.

After these responses, Mr. Lieberman stressed that ACA cable operator members had the ability and desire to provide higher performance broadband services to users in high-cost areas where no or inadequate service is being provided today. ACA and NCTA continue to be opposed to giving price cap incumbent carriers a right of first refusal and instead urge the Commission to award support through a competitive bidding mechanism, which would be the most efficient and fiscally responsible method of distribution.

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This letter is being filed electronically pursuant to section 1.1206 of the Commission's rules.

Sincerely,



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cc: Z. Katz
M. Steffen