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October 19, 2011

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: CC Docket No. 01-92; WC Docket No. 10-90; WC Docket No. 07-135; WC Docket No. 05-337; GN Docket No. 09-51

Dear Ms. Dortch:

On October 17, 2011, Steven Berry, Rebecca Thompson, Tim Donovan, and In-Sung Yoo of RCA — The Competitive Carriers Association, together with the undersigned, met with Commissioner Capps and his legal advisor Margaret McCarthy to discuss RCA's concerns regarding the proposed reforms to high-cost universal service mechanisms at issue in the above-captioned proceedings. On October 18, 2011, the same representatives of RCA and the undersigned met with Commissioner Clyburn and her legal advisors Angela Kronenberg and Louis Peraertz regarding the same issues.

At these meetings, we emphasized two key points. First, although RCA has consistently argued for technologically and competitively neutral high-cost support mechanisms that honor consumer preferences rather than arbitrarily picking winners and losers, RCA reiterated its willingness to support a compromise solution involving a separate Mobility Fund as long as the budget for such a mechanism will ensure sufficient and predictable support. We stressed that a minimum of \$800 million annually should be allocated for supporting wireless ETCs and that the four nationwide carriers should not be eligible to receive such funding. We further noted that, if the Commission adopts RCA's proposal to utilize a forward-looking cost model to determine appropriate support levels, there will be no risk of providing excessive funding, as the budgeted

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\$800 million would be expended only to the extent that model results justify providing such support in any given area.

Second, consistent with RCA's recent letter underscoring the legal and policy reasons for maintaining existing high-cost funding levels during the transition to funding under the proposed Connect America Fund and Mobility Fund,¹ we emphasized that withdrawing support before new funding begins to flow would undermine the Commission's broadband deployment agenda and violate ETCs' legal rights. Although RCA continues to believe that 100 percent of existing high-cost funding should remain available to wireless ETCs during the transition — to ensure that sufficient funds are available to deploy services in high-cost areas and that funding levels will be predictable — RCA submits that any phased reduction in high-cost support should be limited to a total of 20 percent of existing funding over a five-year period.

Please contact the undersigned if you have any questions regarding these issues.

Sincerely,

/s/ Matthew A. Brill

Matthew A. Brill

¹ Letter of Steven K. Berry and Rebecca M. Thompson, RCA — The Competitive Carriers Association, to Marlene H. Dortch, Secretary, FCC, CC Docket No. 01-92 ; WC Docket No. 10-90; WC Docket No. 07-135; WC Docket No. 05-337; GN Docket No. 09-51 (Oct. 13, 2011).