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October 21, 2011

Via ECFS

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

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

Dear Ms. Dortch:

On October 20, 2011, Ross Lieberman, ACA, and the undersigned, Thomas Cohen of Kelley Drye & Warren LLP, met with Christine Kurth, Policy Director and Wireline Counsel to Commissioner McDowell. The purpose of the meeting was to discuss the Commission’s proposed reform of the High-Cost fund, including the creation of the Connect America Fund, the proposed right of first refusal distribution mechanism for that new fund, and the cable industry’s alternative to that proposal.¹ ACA strongly opposes giving price cap incumbent carriers a right of first refusal. Rather, the Commission should award support through competitive bidding, which would be the most efficient and fiscally responsible method of distribution.

¹ See Written Ex Parte Presentation of American Cable Association and National Cable & Telecommunications Association, WC Docket No. 10-90 et al. (Oct. 4, 2011).

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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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Counsel for the American Cable Association

cc: C. Kurth