



NATIONAL TELECOMMUNICATIONS COOPERATIVE ASSOCIATION

*The Voice of Rural Telecommunications*

www.ntca.org

October 26, 2011

***Ex Parte Notice***

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

***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 01-92; Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Lifeline and Link-Up, WC Docket No. 03-109***

Dear Ms. Dortch:

On Wednesday, October 26, 2011, the undersigned on behalf of the National Telecommunications Cooperative Association (“NTCA”) spoke via telephone with Zachary Katz, chief counsel and senior legal advisor to Chairman Julius Genachowski. Mr. Katz was following up on an *ex parte* letter filed by NTCA on Friday, October 21, 2011 relating to the adoption of a restructure mechanism for rate-of-return-regulated rural local exchange carriers (“RLECs”). Consistent with that *ex parte* notice and prior *ex parte* notices filed in these proceedings, *see, e.g., Ex Parte Letter from NTCA* (filed Oct. 20, 2011), we discussed the means by which a restructure mechanism applicable to RLECs might be structured as part of comprehensive intercarrier compensation reform.

Pursuant to the Commission’s rules, a copy of this letter is being filed via ECFS with your office. If you have any questions, please do not hesitate to contact me at (703) 351-2016 or [mromano@ntca.org](mailto:mromano@ntca.org).

Sincerely,

/s/ Michael R. Romano

Michael R. Romano

Senior Vice President - Policy

cc: Zachary Katz