



**OPASTCO**

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November 14, 2011

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

***Ex Parte Notice***

**Re: Lifeline and Link Up Reform and Modernization  
WC Docket No. 11-42**

**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 November 10, 2011, John Rose, Stuart Polikoff, and Brian Ford of the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO) met with Garnet Hanly from the Wireline Competition Bureau. The purpose of the meeting was to discuss the broadband pilot program the Commission intends to establish within the Universal Service Fund Low Income Program in an upcoming order in the above-captioned proceedings.

OPASTCO stated that the Commission should seek to include rural incumbent local exchange carriers (RLECs) as participants in the broadband pilot program. This is because a Lifeline/Linkup broadband pilot that is successful in urban areas served by large carriers will not necessarily be effective in rural areas served by small and mid-sized carriers. OPASTCO also stated that if a permanent broadband support program is ultimately established within Lifeline/Linkup, participation should be limited to eligible telecommunications carriers (ETCs). ETCs have made significant investments in their networks and, in the case of RLECs, they also serve as carriers of last resort. It would be inefficient to permit a non-ETC to receive support for serving low-income consumers in an area where an RLEC or other ETC has already made a substantial investment to serve these households. Also, ETCs have already been evaluated by

either a state commission or the FCC as to their ability to serve all consumers within a designated area upon reasonable request. Finally, OPASTCO stated that should the Commission decide to require broadband providers to offer customers discounted equipment to connect to the Internet under a permanent program, it should ensure that RLECs and other small carriers are able to obtain the equipment at the same prices as larger service providers.

Sincerely,

Stuart Polikoff  
Vice President – Regulatory Policy  
and Business Development  
OPASTCO

cc: Garnet Hanly