



NATIONAL TELECOMMUNICATIONS COOPERATIVE ASSOCIATION

The Voice of Rural Telecommunications

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April 26, 2012

Ex Parte Notice

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

Re: *Connect America Fund, WC Docket, No. 10-90, National Broadband Plan for Our Future, GN Docket No. 09-51, Establishing Just and Reasonable Rates for Local Exchange Carriers, 07-135, High-Cost Universal Service Support, WC Docket No. 05-337, Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92*

Dear Ms. Dortch:

On April 24, 2012, Michael Romano, Senior Vice President – Policy, spoke via telephone with Michael Steffen, Wireline Legal Advisor to Chairman Julius Genachowski and discussed certain issues relating to the above-captioned proceedings.

In that conversation, Mr. Romano reiterated NTCA's position that further action on Universal Service Fund (USF) and intercarrier compensation (ICC) reform should be deferred until pending questions regarding implementation of rule changes adopted in November 2011 are resolved. In addition to the need to resolve outstanding questions relating to implementation, deferral is also appropriate in order to enable providers, end-users, and the markets to absorb the substantial changes that will be occasioned by the new rules, including, but not limited to, increased end-user rates and limitations on carriers' cost recovery. Mr. Romano also reiterated NTCA's concern with the use of a regression analysis to establish caps on USF-supported capital and operating expenses associated with investments made prior to the effective date of the Commission's November 18, 2011 Order (FCC 11-161). Mr. Romano noted the need for parties to review and respond to the caps, as well as the need to ensure that data underlying the regression analysis is accurate.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS with your office.

Ms. Marlene H. Dortch
April 26, 2011
Page 2

Please do not hesitate to contact me at (703) 351-2035 or jseidemann@ntca.org if you have any questions or require additional information.

Respectfully submitted,

/s/ Joshua Seidemann
Joshua Seidemann
Director of Policy

cc: Michael Steffen