



NATIONAL TELECOMMUNICATIONS COOPERATIVE ASSOCIATION

The Voice of Rural Telecommunications

www.ntca.org

September 10, 2012

Ex Parte Notice

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th 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 No. 01-92; Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Lifeline and Link-Up, WC Docket No. 03-109; Universal Service Reform – Mobility Fund, WT Docket No. 10-208

Dear Ms. Dortch:

On Thursday, September 6, 2012, the undersigned on behalf of the National Telecommunications Cooperative Association, together with representatives of 22 companies as listed below (the “Rural Representatives”), met with Commissioner Ajit Pai and Nicholas Degani, Wireline Legal Advisor to Commissioner Pai. Senator Jerry Moran, and Mark Colwell and Pam Henderson from the Office of Senator Moran, were also present in the meeting.

The Rural Representatives discussed how the lack of certainty resulting from Universal Service Fund (“USF”) reform has caused small telecom companies such as those in attendance to curtail broadband deployment; several companies in attendance also explained how the reforms have fomented job losses. The Rural Representatives cited in particular the lack of transparency in the regression analysis model, which renders companies unable to predict future model outcomes and resulting USF support, as well as concerns with respect to further potential reforms. The Rural Representatives urged the Federal Communications Commission (the “Commission”) to take prompt steps to dispel regulatory uncertainty by establishing cost recovery mechanisms that are both predictable and sufficient, and that will promote sustainable broadband deployment and rural economic development.

Finally, the Rural Representatives noted that a waiver process – particularly one as burdensome as the current mechanism – does not and cannot resolve concerns about the impacts of USF reforms. Moreover, a standard that requires *complete loss of voice service* to obtain a waiver is not only an excessively high threshold, but it is also detached from both a statutory universal service mandate that requires *reasonably comparable* services in rural and urban areas and the objectives of reform ostensibly intended to promote *broadband* availability and adoption.

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Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS. Copies of the materials provided by various participants during the meeting are attached hereto. If you have any questions please do not hesitate to contact me.

Sincerely,

/s/ Meagan Foster

Meagan Foster

Director of Government Affairs

Enclosures

cc: Commissioner Ajit Pai
Nicholas Degani

Companies in attendance:

Greg Aldridge, KanOkla Networks, Caldwell
Janet Bathurst, S&A Telephone Company, Inc., Allen
Cary Bedene, Craw-Kan Telephone Cooperative, Inc., Girard
Kathy Billinger, Peoples Telecommunications, LLC, LaCygne
Bob Boaldin, Epic Touch, Elkhart
Dian Boaldin, Epic Touch, Elkhart
Brian Boisvert, Wilson Communications, Wilson
Trish Carroll, Columbus Telephone, Columbus
Steve Davis, SCTelcom, Inc., Medicine Lodge
Terry Force, Blue Valley Tele-Communications, Inc., Home
Mike Foster, Twin Valley Telephone Company, Inc., Miltonvale
Rhonda Goddard, Nex-Tech, Lenora
Dale Jones, Tri-County Telephone Association, Inc., Council Grove
Jill Kuehny, KanOkla Networks, Caldwell
Harry Lee, LaHarpe Telephone, LaHarpe
Archie Macias, Wheat State Telephone, Udall
Pat Morse, FairPoint Communications, Dodge City
Catherine Moyer, Pioneer Communications, Ulysses
Mike Murphy, Gorham Telephone Company, Gorham
Tonya Murphy, Gorham Telephone Company, Gorham
Beau Rebel, Golden Belt Telephone Association, Inc., Rush Center
Steve Sackrider, Wamego Telephone Company, Inc., Wamego
Larry Sevier, Nex-Tech, Lenora
Carla Shearer, Home Communications, Galva
Michael Shannon, Epic Touch, Elkhart
Gary Slough, S&T Telephone Cooperative Association, Brewster
Craig Wilbert, Craw-Kan Telephone Cooperative, Inc., Girard