



September 24, 2012

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

Re: Connect America Fund, WC Docket No. 10-90; High-Cost Universal
Service Support, WC Docket No. 05-337

Dear Ms. Dortch:

This is to inform you that on Thursday, September 20, 2012, Jon Banks and Robert Mayer with USTelecom, Mary Henze with AT&T, Michael Saperstein with Frontier, Maggie McCready with Verizon, and Eric Einhorn with Windstream (“Coalition”) met with FCC staff member Priscilla Argeris in connection with the need to advance the objectives of the Transformation Order as it relates to price cap carriers and consumers living in the territory they serve in 2013.

The Coalition members reiterated the Commission’s finding that over 80% of households without broadband service are located in areas served by price cap carriers. We explained that current uncertainty around the availability of price cap carrier support constrains coalition members from making investment decisions. We urged the Commission to approve the pending CenturyLink and Windstream petitions, expedite access to the remaining 2012 and budgeted 2013 CAF funds, and move rapidly to adopt a sensible model that would produce results consistent with objectives in the Order and in the 706 Report. These actions, taken together, represent the most efficient mechanisms to support broadband networks in areas where no private business case exists to provide service.

We discussed the ICC and CAF components of the Order and the investment implications for our members in implementing only one side of a carefully balanced equation. We discussed how any interim funding plan for 2013 should adopt eligibility criteria related to disqualifying geographic areas in ways that harmonize broadband service requirements with funding eligibility requirements. Finally, we discussed the importance of moving to model-based funding to better connect rural America.

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Pursuant to Commission rules, please include a copy of this notice in each of the above-identified proceedings.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert L. Mayer". The signature is written in a cursive style with a large initial "R" and "M".

Robert Mayer
Vice President, Industry and State Affairs
United States Telecom Association

cc: Priscilla Argeris