



NATIONAL TELECOMMUNICATIONS COOPERATIVE ASSOCIATION

The Voice of Rural Telecommunications

www.ntca.org

October 18, 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 Wednesday, October 17, 2012, the undersigned, on behalf of the National Telecommunications Cooperative Association (“NTCA”), had telephone conversations with Michael Steffen, Legal Advisor to Chairman Julius Genachowski, and Julie Veach, Chief of the Wireline Competition Bureau; Priscilla Argeris, Legal Advisor to Commissioner Jessica Rosenworcel; Nicholas Degani, Legal Advisor to Commissioner Ajit Pai; and Rebekah Goodheart from the Wireline Competition Bureau. The subject matter discussed in those conversations related to regression analysis issues, and my presentation was consistent with the discussions described in the *Ex Parte* letter filed yesterday, October 17, 2012, by NTCA, the Organization for the Promotion and Advancement of Small Telecommunications Companies, the Western Telecommunications Alliance, and the National Exchange Carrier Association.

In particular, NTCA expressed support for the Federal Communications Commission (the “Commission”) to: (1) extend the phase-in associated with the regression analysis caps pending further review of concerns raised by various pleadings in these proceedings; (2) maintain the current 2012 model cost limits but add together the CAPEX and OPEX values for 2013 support calculations pending consideration of a single regression model; (3) adopt as a default rule that the caps will be held constant, as calculated on a total study area basis as of the model base period, for a period of several years starting in 2014 subject to further review and testing of the caps as described below; (4) ensure that any near-term steps taken with respect to the model are carefully coordinated and subject to reasonable transitions in connection with needed broader review and testing of the model; and (5) conduct further testing and analysis over the next twelve months to identify potential alternatives for improving predictability specifically and the accuracy and transparency of the model generally.

NATIONAL TELECOMMUNICATIONS COOPERATIVE ASSOCIATION

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Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS.
If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

/s/ Michael R. Romano
Michael R. Romano
Senior Vice President – Policy

cc: Michael Steffen
Priscilla Delgado Argeris
Nicholas Degani
Julie Veach
Rebekah Goodheart