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November 8, 2012

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: 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; Promoting Interoperability in the 700 MHz Commercial Spectrum, WT Docket No. 12-69

Dear Ms. Dortch:

On November 7, 2012, Steven Berry, Rebecca Murphy Thompson, Tim Donovan, and Sean Spivey of Competitive Carriers Association (“CCA”), together with the undersigned, met with Nick Degani, Legal Advisor to Commissioner Pai, and Priscilla Delgado Argeris, Legal Advisor to Commissioner Rosenworcel, regarding the anticipated Notice of Proposed Rulemaking (“NPRM”) that will address the disposition of unclaimed funding from Phase I of the Connect America Fund (“CAF”). In addition, on November 8, 2012, Messrs. Berry, Donovan, and Spivey and Ms. Thompson met with Christine Kurth, Policy Director and Wireline Counsel to Commissioner McDowell, regarding the same NPRM.

At these meetings, consistent with CCA’s letter to Chairman Genachowski dated October 31, 2012, we argued that the NPRM should seek comment on whether and how wireless carriers could make efficient use of the unclaimed Phase I CAF support, alongside other proposals for such funding. We explained that the Commission should welcome alternative viewpoints on this important question, rather than cutting off debate at the outset of the proceeding. We further noted that, in light of the prospect that price cap incumbent LECs could use CAF support to

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deploy wireless facilities, rather than extending or upgrading their wireline networks, it would be especially inappropriate to foreclose participation by wireless carriers that are *not* affiliated with incumbent LECs. Accordingly, the Commission should include language along the following lines in the NPRM: “In a letter filed on August 3, 2012, CCA (then known as RCA — The Competitive Carriers Association) proposed that the Phase I CAF support unclaimed by price cap LECs should be reallocated to the Mobility Fund. We seek comment on that proposal.”

CCA also argued that the Commission should ensure that CAF Phase II is administered in the most competitively neutral and cost-effective manner possible. In particular, as CCA has previously proposed, the Commission should refrain from providing excessive funding to incumbent LECs (including through any cost model), eliminate the arbitrary limits it has imposed on support for wireless carriers, and revise its annual budgets to channel increased support to wireless providers.

In addition, CCA also made the unrelated argument that the Commission should restore interoperability to the Lower 700 MHz band by the end of the year. The record in the interoperability proceeding supports prompt resolution.

Please contact the undersigned if you have any questions regarding these issues.

Sincerely,

/s/ Matthew A. Brill

Matthew A. Brill