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November 16, 2012

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

**Re: Notice of Oral Ex Parte Presentation
WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135,
WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No.
96-45, WC Docket No. 03-109 and WT Docket No. 10-208**

Dear Ms. Dortch:

On November 14, 2012, representatives of the Wireless Internet Service Providers Association (“WISPA”) met with Commission staff to discuss issues related to the Commission’s ongoing Universal Service Fund (“USF”) proceedings. Attending on behalf of WISPA were Matthew Larsen, a WISPA Board member and owner of Inventive Wireless of Nebraska, LLC, a Nebraska wireless Internet service provider (“WISP”); Jeff Kohler, Chief Development Officer of JAB Wireless, Inc., a WISP operating in 14 states; Clay Stewart, CEO of Tye River Farms, Inc. dba Stewart Computer Services, a WISP based in central Virginia; and undersigned counsel to WISPA. Attending on behalf of the Commission were Julie Veach, Carol Matthey, Michael Jacobs, Amy Bender, Vickie Robinson, Ryan Yates, Erin Boone, Heidi Lankau and Theodore Burmeister of the Wireline Competition Bureau.

The parties reviewed the attached presentation, which discusses WISPA’s positions on various USF issues. The WISPA representatives explained the cost benefits of providing unsubsidized fixed terrestrial wireless broadband to rural areas of the country, and the need to ensure that Connect America Fund (“CAF”) support is not extended to areas where both unsubsidized voice and unsubsidized broadband are available but may be provided by different entities. The WISPA parties voiced their support of the “self-provisioning” proposal that would condition CAF support on the recipient’s obligation to allow interconnection on reasonable and non-discriminatory terms so that unsubsidized broadband providers in nearby areas can provide service at lower cost.

The WISPA representatives reiterated WISPA’s view that the Commission should reject the requests for waiver of the CAF Phase I rules filed by each of CenturyLink,

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Windstream, FairPoint and Alaska Communications systems, and should direct unused Phase I funds to the Remote Areas Fund.

The WISPA representatives explained that the Commission should not require standalone broadband providers, who are not providers of “telecommunications” under existing interpretations and thus do not currently pay into USF, to contribute into USF.

The parties also discussed the Remote Areas Fund (“RAF”). Mr. Larsen discussed WISPA’s proposal for a voucher system whereby consumers subscribing to broadband service would submit documentation to the Commission, which would then issue a one-time payment to the provider chosen by the consumer. This would eliminate administrative burdens associated with other support methods and ensure that funds were provided only for consumers in remote areas. In connection with the RAF, the WISPA parties reiterated their support for a nationwide ETC system that would enable entities that are not providers of “telecommunications services” to receive RAF support.

Pursuant to Section 1.1206 of the Commission’s Rules, this notice is being filed via ECFS in the above-referenced proceedings. Please direct any questions regarding this notice to the undersigned.

Respectfully submitted,

/s/ Stephen E. Coran
Stephen E. Coran

Enclosure

cc: Julie Veach
Carol Matthey
Michael Jacobs
Amy Bender
Vickie Robinson
Ryan Yates
Erin Boone
Heidi Lankau
Theodore Burmeister