



NATIONAL TELECOMMUNICATIONS COOPERATIVE ASSOCIATION

The Voice of Rural Telecommunications

www.ntca.org

December 21, 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

Dear Ms. Dortch:

On Thursday, December 20, 2012, the undersigned, on behalf of the National Telecommunications Cooperative Association (“NTCA”), spoke via telephone with Chelsea Fallon of the Wireline Competition Bureau regarding the above-referenced proceeding.

NTCA urged the Federal Communications Commission (the “Commission”) to provide rural incumbent local exchange carriers with a reasonable amount of time to evaluate and establish their respective study area boundaries prior to compelling certification and the filing of maps in shapefile format. Because this is an entirely new process, it is particularly important that the Commission afford smaller carriers sufficient time within which to review their own boundaries, to coordinate where necessary with neighboring carriers, and/or to work with state commissions that may hold or be planning to file data of their own. Furthermore, given that the Commission has already acknowledged this process requires review and reconciliation to address potential gaps or overlaps in reported study areas even after filings are made, NTCA encouraged the Commission to ensure that the final certification process appropriately recognizes the novel nature of this process and the fact that, in certain cases, carriers may have limited capability to validate data held by others (such as by states that submit their own data).

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: Chelsea Fallon

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