

January 25, 2013

***Ex Parte Notice***

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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, January 23, 2013, the undersigned, on behalf of the National Telecommunications Cooperative Association (“NTCA”), together with Stuart Polikoff from the Organization for the Promotion and Advancement of Small Telecommunications Companies and Derrick Owens of the Western Telecommunications Alliance, held separate telephone conversations with Priscilla Argeris, Legal Advisor to Commissioner Jessica Rosenworcel, and Nicholas Degani, Legal Advisor to Commissioner Ajit Pai, to discuss certain matters in the above-referenced proceedings.

In those conversations, we raised the need for the Federal Communications Commission (the “Commission”) to take both near-term and longer-term steps to address statistical and data-related shortcomings with respect to the regression analysis-based caps on universal service fund support. *See, e.g.*, Application for Review of NTCA, *et al.*, WC Docket No. 10-90 (filed May 25, 2012). Specifically, we pressed for near-term resolution of certain concerns with respect to such caps consistent with prior presentations, *see, e.g.*, *Ex Parte* Letter from Michael R. Romano, Sr. Vice President – Policy, NTCA, to Marlene H. Dortch, Secretary, WC Docket No. 10-90, *et al.* (filed Oct. 18, 2012), and also raised the need for review, testing, and resolution in coming weeks and months of broader concerns with respect to the persistent lack of transparency, accuracy, and predictability within the capping mechanisms.

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: Priscilla Argeris  
Nicholas Degani