



February 19, 2013

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; High-Cost Universal Service Support, WC Docket No. 05-337; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition; Petition of the National Telecommunications Cooperative Association for a Rulemaking to Promote and Sustain the Ongoing TDM-to-IP Evolution, GN Docket No. 12-353; Technology Transitions Policy Task Force, GN Docket No. 13-5

Dear Ms. Dortch:

On Friday, February 15, 2013, the undersigned, on behalf of the National Telecommunications Cooperative Association (“NTCA”), met with Rebekah Goodheart, Associate Chief of the Wireline Competition Bureau and Deputy Director of the Technology Transitions Task Force.

During this meeting, NTCA raised the need for a near-term solution that makes universal service fund (“USF”) support available to rural local exchange carriers (“RLECs”) for broadband-capable networks even where a consumer might choose not to take regulated local exchange service (“POTS”) on the specific loop to be supported. This discussion was consistent with prior positions advocated by NTCA. *See Ex Parte* Letter from Michael R. Romano, Senior Vice President-Policy, NTCA, to Marlene H. Dortch, Secretary, Federal Communications Commission (the “Commission”), WC Docket Nos. 10-90 and 05-337, GN Docket Nos. 12-353 and 13-5 (filed Jan. 28, 2013). In particular, NTCA notes that rules denying USF support for broadband-capable networks in high-cost areas based solely upon a rural customer’s choice to purchase only broadband (even when voice is available) significantly undermine consumer freedom of choice and inhibit technological evolution. NTCA further notes that the Commission clearly grasped the need for change in the text of its November 2011 reform order, indicating that USF support would be available not just for the *sale* of POTS, but also for the *offer* of “voice telephony service.” I therefore urged the Commission to complete the transition it has already adopted on the face of the November 2011 order – and thereby facilitate technological evolution – through simple and straightforward technical fixes to existing rules that would implement this vision for consumers in areas served by RLECs.

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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: Rebekah Goodheart