



March 13, 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 Monday, March 11, 2013, the undersigned, on behalf of NTCA–The Rural Broadband Association, together with Jeff Dupree and Teresa Evert from the National Exchange Carrier Association, spoke via telephone with Alexander Minard and Christopher Cook of the Wireline Competition Bureau to discuss matters in the above-referenced proceedings.

During that conversation, we urged the Federal Communications Commission (the “Commission”) to provide more guidance with respect to what reporting requirements remain pending for approval by the Office of Management and Budget pursuant to the Paperwork Reduction Act, as well as the dates of reporting compliance to the extent these requirements receive the necessary approvals. We further discussed new proposed Form 481, a form that captures a number of the reporting requirements set forth in 47 C.F.R. § 54.313. We noted that, even as the form is being submitted for approval, it appears to include a number of discrete data-collection items that: (1) have not themselves yet received the necessary approvals; and/or (2) involve matters that could not be subject to reporting mandates in 2013 given that they would have required collection of data in 2012. For example, we specifically urged the Commission to refrain from requiring the filing of five-year service quality improvement plans that include broadband build-out targets and maps in 2013 for the latter reason (among others). We observe that while rural local exchange carriers may have been subject to a general requirement in 2012 to extend certain levels of broadband Internet access service upon receipt of a reasonable request from a consumer, the specific data-gathering items contemplated in the five-year “build-out” plan were not effective in 2012 and such reports therefore should not be required until 2014.

Marlene H. Dortch

March 13, 2013

Page 2 of 2

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: Alexander Minard  
Christopher Cook