



May 15, 2013

Ex Parte Notice

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

Re: *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; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; Developing a Unified Inter-carrier Compensation Regime, CC Docket No. 01-92; Rural Call Completion, WC Docket No. 13-39*

Dear Ms. Dortch:

On Monday, May 13, 2013, Shirley Bloomfield, Chief Executive Officer of NTCA–The Rural Broadband Association (“NTCA”), met with Rebekah Goodheart, Acting Wireline Legal Advisor to Commissioner Mignon Clyburn’s office, to discuss matters in the above-referenced proceedings.

Consistent with recent NTCA *ex parte* presentations, Ms. Bloomfield discussed the need for technical fixes to the rules of the Federal Communications Commission (the “Commission”) to ensure that consumers in rural areas can obtain the affordable fixed broadband services that are in great demand and that also provide the essential foundation for other communications services, including over-the-top voice and wireless services. Specifically, consistent with those prior presentations, Ms. Bloomfield discussed how providing support for loops that are used to provide standalone broadband services would promote and accelerate the ongoing IP evolution, and finally provide the basis for a Connect America Fund that supports broadband-capable networks that enable advanced communications and enhanced consumer choice in *all* rural areas. See, e.g., *Ex Parte* Letter from Michael R. Romano, NTCA, to Marlene H. Dortch, Secretary, Commission, WC Docket No. 10-90, *et al.* (filed Feb. 22, 2013); *Ex Parte* Letter from Michael R. Romano, NTCA, to Marlene H. Dortch, Secretary, Commission, WC Docket No. 10-90, *et al.* (filed April 1, 2013).

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Ms. Bloomfield also discussed, consistent with recent NTCA *ex parte* presentations, the need to address continuing concerns with respect to uncertainty arising out of application of regression analysis-based caps and the potential for additional cuts, caps, and constraints on support that remain under consideration. *See, e.g., Ex Parte* Letter from Michael R. Romano, NTCA, to Marlene H. Dortch, Secretary, Commission, WC Docket No. 10-90, *et al.* (filed April 24, 2013).

Finally, Ms. Bloomfield noted that significant concerns persist with respect to rural call completion issues and that, if anything, there has been an increase in the reported frequency and severity of such problems in the wake of recent enforcement action undertaken by the Commission. NTCA appreciates the Commission's efforts to examine these issues through a notice of proposed rulemaking and in other contexts. But given the continuing nature of serious, customer-affecting issues (including school alert problems and businesses being unable to receive calls from their would-be customers), Ms. Bloomfield urged the Commission and its Enforcement Bureau to take prompt action to sanction publicly and forcefully other parties failing to route calls properly – thereby sending a message to service providers that its recent enforcement action was not a “one-time occurrence” and that such conduct will indeed not be tolerated.

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