



June 10, 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; 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, June 6, 2013, and Monday, June 10, 2013, the undersigned, on behalf of NTCA–The Rural Broadband Association (“NTCA”), spoke separately via telephone with Travis Litman of the Wireline Competition Bureau and Jane Jackson of the Wireless Telecommunications Bureau, respectively, regarding the petition filed by Adak Eagle Enterprises in the above-referenced dockets.

During these conversations, NTCA expressed positions consistent with its prior filing on this matter. *See Ex Parte* Letter from Michael R. Romano, Sr. Vice President-Policy, NTCA, to Marlene H. Dortch, Secretary, Federal Communications Commission (the “Commission”), WC Docket No. 10-90, *et al.* (filed July 31, 2012). In particular, NTCA noted that there should be no mismatch between the evidentiary detail and foundation required from those seeking to sustain operations as carriers of last resort (“COLRs”) in high-cost, hard-to-serve areas and those that submit information asserting there is no need for sustained universal service fund (“USF”) support for the incumbent COLR in such areas.

This is not to say that the Commission should not be thorough in its review of any waiver petition that has been filed, but it should also not accept at face value without a comparable level of analysis and validation the claims of those who challenge the maintenance of a given level of USF support in a particular high-cost area. *See also, e.g.,* Comments of NTCA, *et al.*, WC Docket No. 10-90 (filed Feb, 19, 2013), at ii (“There should be no room for or tolerance of ‘short-cuts’ in fulfilling the statutory requirement of universal service, and the Commission’s commitment to data-driven decision-making should be reflected in a more informed and thoughtful evidentiary process for identifying potential ‘unsubsidized competitors’”) Instead, comparable levels of diligence and accountability should be required in all respects – including ensuring that consumers will indeed continue to receive reasonably comparable voice and broadband services at reasonably comparable rates in a manner that is consistent with applicable law should USF support be reduced or eliminated in a given area based in part upon the assertions of a would-be competitor.

Marlene H. Dortch

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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: Jane Jackson
Travis Litman