



Federal Communications Commission
Washington, D.C. 20554

June 25, 2013

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch:

On Tuesday, October 9, 2012, the Wireline Competition Bureau (Bureau) announced the commencement of the Connect America Cost Model (CAM) virtual workshop to solicit input and facilitate discussion on topics related to the development and adoption of the forward-looking cost model for Connect America Phase II.¹ To date, the Bureau has solicited comment on 28 different topics in the CAM virtual workshop.²

On three occasions, the Bureau has submitted into the record comments posted by parties in the CAM virtual workshop.³ These submissions reflect comments posted to the CAM virtual workshop through April 29, 2013. With this letter, the Bureau supplements the previous record by submitting comments posted by parties in the CAM virtual workshop from April 30, 2013 through June 24, 2013.

In addition, various parties have discussed the potential relevance of International Telecommunication Union (ITU) standards and the Commission's Measuring Broadband America (MBA) program in the record. The Bureau may rely on ITU latency calculations, MBA data and other technical documents in implementing the Commission's latency requirement. We accordingly place the following sources into the record:

¹ *Wireline Competition Bureau Announces Commencement of Connect America Phase II Cost Model Virtual Workshop*, WC Docket Nos. 10-90, 05-337, Public Notice, 27 FCC Rcd 11977 (Wireline Comp. Bur. 2012). *See also Wireline Competition Bureau Announces Connect America Phase II Cost Model Virtual Workshop*, WC Docket Nos. 10-90, 05-337, Public Notice, 27 FCC Rcd 11056 (Wireline Comp. Bur. 2012).

² WCB Cost Model Virtual Workshop, <http://www.fcc.gov/encyclopedia/connecting-america> (follow link to the Cost Model Virtual Workshop).

³ Letter from Michael Jacobs, Legal Advisor to the Chief, Wireline Competition Bureau, FCC, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 10-90 (filed Feb. 6, 2013); Letter from Jamie Susskind, Legal Advisor to the Chief, Wireline Competition Bureau, FCC, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 10-90 (filed Mar. 27, 2013); Letter from Michael Jacobs, Legal Advisor to the Chief, Wireline Competition Bureau, FCC, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 10-90 (filed Apr. 30, 2013).

- FED. COMM'NS COMM'N OFFICE OF ENG'G AND TECH. AND CONSUMER AND GOVERNMENTAL AFFAIRS BUREAU, 2013 MEASURING BROADBAND AMERICA FEBRUARY REPORT, A REPORT ON CONSUMER WIRELINE BROADBAND PERFORMANCE IN THE U.S. (2013), <http://transition.fcc.gov/cgb/measuringbroadbandreport/2013/Measuring-Broadband-America-feb-2013.pdf>.
- FED. COMM'NS COMM'N OFFICE OF ENG'G AND TECH. AND CONSUMER AND GOVERNMENTAL AFFAIRS BUREAU, MEASURING BROADBAND AMERICA 2013 REPORT, VALIDATED DATA – 2013 (2013), <http://www.fcc.gov/measuring-broadband-america/2013/validated-data-february-2013>.
- INTERNET ENG'G TASK FORCE, FRAMEWORK FOR TCP THROUGHPUT TESTING (REQUEST FOR COMMENT 6349) (2011) <http://tools.ietf.org/html/rfc6349>.
- INTERNET ENG'G TASK FORCE NETWORK WORKING GROUP, A SIMPLE NETWORK MANAGEMENT PROTOCOL (SNMP) (1990), <http://www.ietf.org/rfc/rfc1157.txt?number=1157>.
- Internet Eng'g Task Force Proposed Working Group, Large Scale Measurement of Access Network Performance (lmap), <https://datatracker.ietf.org/wg/lmap/> (last visited June 21, 2013).
- INT'L TELECOMM. UNION, TELECOMM. STANDARDIZATION SECTOR, SERIES G: TRANSMISSION SYSTEMS AND MEDIA, DIGITAL SYSTEMS AND NETWORKS, G.114 (2003), <http://www.itu.int/rec/T-REC-G.114-200305-I/en>.
- INT'L TELECOMM. UNION, TELECOMM. STANDARDIZATION SECTOR, SERIES Y: GLOBAL INFORMATION INFRASTRUCTURE, INTERNET PROTOCOL ASPECTS AND NEXT-GENERATION NETWORKS, Y.1541 (2011), <http://www.itu.int/rec/T-REC-Y.1541/en>.

Respectfully Submitted,

_____/s/_____
 Michael J. Jacobs
 Legal Advisor to the Chief
 Wireline Competition Bureau

Attachment