

July 30, 2013

VIA ELECTRONIC FILING

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

Re: In the Matter of Connect America Fund, WC Docket No. 10-90 and High-Cost Universal Service Support, WC Docket No. 05-337.

Dear Ms. Dortch:

On July 26, 2013 Cheryl L. Parrino of Parrino Strategic Consulting Group called Carol Mattey of the Wireline Competition Bureau on behalf of the Nebraska Rural Independent Companies (NRIC) to discuss the appropriate process for authorizing the public release of additional results of the Connect America Fund Cost Model (“CAM”) such as that which the FCC has done through its illustrative run released:

<http://www.fcc.gov/encyclopedia/connect-america-cost-model-version-312-illustrative-results>. Ms. Mattey indicated that the Commission has solicited input from the public regarding what additional data items should be made public. I indicated that the following data would be of value to the discussion and requested that this information be made available to the public. Specifically, using as an example the CAF II – CAM 3.1.4 Report Version 3.0, Report Reference Number 1.2 of the updated June 21, 2013 “Reports Showing Results with an Illustrative \$52 Funding Threshold and a Eight Percent Cost of Money,” I indicated that any additional illustrative runs should include the following information:

1. The same table header information updated with the parameters identified therein for the new illustrative run;
2. The total number of locations by company, by state and nationwide;
3. The total number of locations by company, state, and nationwide above the “Alt Tech Cutoff”; and

4. The percentage of locations above the Alt Tech Cutoff by company, state, and nationwide compared to total company, total state-wide and total nationwide locations.

I indicated that NRIC believes that this publicly available information would add value and lead to more robust discussion of the FCC's efforts to establish a properly developed CAM for federal USF disbursements to price cap carriers and, in the absence of such public release, is concerned that the funding and Alt Tech Cutoff threshold may be too low such that: 1) CAM-determined federal USF could be distributed to areas where a business case could already be made for broadband deployment; 2) federal USF funding would be shifted away from higher cost rural areas to lower cost areas; and 3) large numbers of rural customers would not have access to broadband services that are comparable to services received in non-rural areas and thus would be treated unequally. I indicated that the need for this information is also important so that the public can determine and assess the consumer impacts in those areas where a rate-of-return carrier may opt into price cap CAM support or in all rural areas if the Commission inappropriately applies the same price cap CAM thresholds to rate-of-return carriers.

This letter is being filed pursuant to Section 1.1206(b) of the Commission's rules.

Sincerely,



Cheryl L. Parrino

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Cc: Carol Matthey