



September 5, 2013

***Ex Parte Notice***

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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***

Dear Ms. Dortch:

On Wednesday, September 4, 2013, the undersigned, on behalf of NTCA–The Rural Broadband Association (“NTCA”), met with Carol Matthey, Amy Bender, and Chin Yoo of the Wireline Competition Bureau (the “Bureau”) to discuss matters in the above-referenced proceedings.

Specifically, we discussed the consideration of targeted programs to refine universal service support mechanisms in areas served by rate-of-return-regulated rural local exchange carriers (“RLECs”) to facilitate consumer choice and stimulate adoption of broadband. NTCA noted that it had joined with other stakeholders to file detailed proposed rules explaining how such targeted updates could be made to aid the transition from legacy support mechanisms to a Connect America Fund for RLECs. *See* Comments of NTCA, *et al.*, WC Docket No. 10-90 (filed June 17, 2013), at 1-10 and Attachment 1 (proposing targeted rule changes that would support broadband-capable networks regardless of whether any given RLEC consumer chooses to take voice telephony service that will be offered by the RLEC). NTCA expressed its interest in continued conversations regarding such matters and in finding paths forward to ensure that consumers in RLEC-served areas can participate meaningfully in an IP-enabled, broadband-capable world while having a panoply of service options from which to choose on a supported network. Consistent with NTCA’s prior filings, we also discussed issues that require resolution for RLECs to evaluate possible voluntary paths to avail themselves of model-based universal service support. *See id.* at 11-27.

We further discussed how to proceed with respect to the need for changes to the quantile regression analysis (“QRA”)-based caps in the wake of the Sixth Order on Reconsideration released by the Federal Communications Commission (the “Commission”) earlier this year and the Bureau’s order earlier this summer providing additional temporary relief from the caps. We discussed in particular the need to balance the Commission’s desire to apply fiscal discipline and accountability in the use of universal service support through the QRA mechanism with the specific requirement that such support be predictable and with broader public policy objectives that contemplate transparency in regulation.

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Thank you for your attention to this correspondence. Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS.

Sincerely,

/s/ Michael R. Romano  
Michael R. Romano  
Senior Vice President – Policy

cc: Carol Matthey  
Amy Bender  
Chin Yoo