



November 7, 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*

Dear Ms. Dortch:

As the Federal Communications Commission (the “Commission”) continues to consider the use of a model to distribute Connect America Fund (“CAF”) support for price-cap regulated carriers, NTCA–The Rural Broadband Association (“NTCA”) submits the enclosed paper by Vantage Point Solutions into the record of the above-referenced proceedings to aid in consideration of potential reliance on “alternative technologies” in “extremely high-cost” areas as identified by such models.

Although NTCA members and other rate-of-return-regulated local exchange carriers (“RLECs”) are not subject to the Connect America Fund Phase II mechanisms under Commission rules, as NTCA has indicated in prior filings, certain RLECs may be interested in voluntarily availing themselves of some form of model-based universal service support in the future – although not the precise CAF model being developed now for the larger price cap-regulated companies. *See, e.g.,* Comments of NTCA, *et al.*, WC Docket No. 10-90, *et al.* (filed June 17, 2013), at 11-27; *Ex Parte* Letter from Michael R. Romano, Senior Vice President – Policy, NTCA, to Marlene H. Dortch, Secretary, Commission, WC Docket No. 10-90, *et al.* (filed Sept. 12, 2013), at 9; *see also Wireline Competition Bureau Seeks Comment on Options to Promote Rural Broadband in Rate-of-Return Areas*, Public Notice, DA 13-1112 (rel. May 16, 2013) (seeking comment on “facilitating rate-of-return carriers’ voluntary participation in Connect America Phase II”). To the extent that any RLECs may seek to participate voluntarily hereafter in model-based support, however, it is important that the model be calibrated carefully to capture the unique nature of small company operations and challenges. It is also essential as a more general matter that full account is taken of what it may mean for consumers and the very concept of “reasonably comparable” universal service if significant reliance is placed upon “alternative technologies” to provide voice and broadband services in high-cost areas. To help inform this discussion, NTCA submits the attached technical paper discussing the capabilities and limitations of satellite communications services as part of a national universal service strategy.

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Thank you for your attention to this correspondence. 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

Enclosure