



November 21, 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; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition; Petition of NTCA for a Rulemaking to Promote and Sustain the Ongoing TDM-to-IP Evolution, GN Docket No. 12-353; Technology Transitions Policy Task Force, GN Docket No. 13-5***

Dear Ms. Dortch:

On Tuesday, November 19, 2013, the undersigned, on behalf of NTCA–The Rural Broadband Association (“NTCA”), together with Douglas Boone, Chief Executive Officer of Premier Communications, and Kevin Larson, Chief Executive Officer/General Manager of Consolidated Telecommunications Company, met with Nicholas Degani, legal advisor to Commissioner Ajit Pai, regarding matters in the above-referenced proceedings.

First, we discussed the need for refinement of universal service support in areas served by rate-of-return-regulated rural local exchange carriers to facilitate consumer choice and stimulate adoption of broadband. We noted that stakeholders had submitted detailed rules explaining how such updates could transition 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. As Messrs. Boone and Larson explained based upon their own experiences in handling customer service requests, such changes are essential to be able to respond to evolving consumer demands in an IP-enabled world.

Furthermore, consistent with prior *ex parte* communications, we urged reconsideration of the elimination of Safety Net Additive support for companies that qualified based upon investments during 2010 and 2011. *See, e.g., Ex Parte* Letter of Michael R. Romano, Senior Vice President-Policy, NTCA, to Marlene H. Dortch, Secretary, Commission, WC Docket No. 10-90, *et al.* (filed July 26, 2013), at 2. Messrs. Boone and Larson explained how the flash-cut loss of such support in late 2011 had affected the ability of their companies to complete reasonable plans for broadband-capable network construction projects over a series of years.

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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: Nicholas Degani