Advocates for Rural Broadband
Mark M. Gailey
President

Kelly Worthington
Executive Vice President

Filed Via ECFS
Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

RE: WC Docket Nos. 10-90 and 05-337; CC Docket No. 01-92; and GN Docket Nos. 12-353 and 13-5

Dear Ms Dortch:

On Tuesday, November 19, 2013, Mark Gailey of Totah Communications, Inc.; Bob DeBroux of TDS Telecommunications Corp.; Archie Macias of Wheat State Telephone; Derrick Owens, Noah Cherry and Gerry Duffy representing WTA met with Daniel Alvarez, Legal Advisor, Wireline, Public Safety, and Homeland Security to Chairman Thomas Wheeler to discuss the nature and role of WTA in the telecommunications industry and to identify some of the issues of interest to WTA's members.

WTA is a national trade association that represents more than 250 rural local exchange carriers ("RLECs"). Whereas WTA was formed to represent small RLECs in the isolated and sparsely populated areas of the 24 states located west of the Mississippi River (including Alaska and Hawaii), it now welcomes members from the rural portions of the Eastern states as well. Messers Gailey, DeBroux and Macias are directors of WTA; in addition, Mr. Gailey is the current President of WTA and Mr. DeBroux is the Co-Chairperson of its Public Policy Committee.

WTA's members are no longer simply just voice telephone companies, but rather they have gone a long way toward converting their networks to broadband and desire to continue evolving into progressive and diversified broadband service providers. Whereas universal service and intercarrier arrangements continue to be important bread-and-butter issues for WTA members, they are also very interested in the TDM-to-IP transition, video program distribution alternatives, e-rate modernization, cybersecurity, and emerging service opportunities.

WTA members and other RLECs made great progress during the last decade in deploying high-speed fiber optic facilities deeper and deeper into their networks, and in offering their rural customers higher and higher capacity broadband services. However, the various limitations, reductions and regulatory uncertainties imposed upon critical high-cost support and intercarrier compensation revenue streams by the November 2011 USF/ICC Order have had a major adverse impact upon broadband investment and financing. WTA looks forward to working with the Chairman's Office, and continuing to work with the Wireline Competition Bureau and the other Commissioners, to improve the accuracy and predictability of the Commission's universal service support mechanisms, and to eliminate adverse unintended consequences of certain models and caps.

WTA noted that, even when its members and other RLECs are able to invest in the desired upgrades of their local networks, the broadband services and rates in their service areas will also depend upon the availability, capacity and pricing of the Middle Mile facilities needed to take RLEC broadband traffic to and from the Internet. The nature and extent of this problem will vary from RLEC to RLEC. Some RLECs have access to

statewide or regional fiber rings, whereas others are forced to depend upon a single route served by a single large carrier.

Finally, WTA noted that it has been working with other rural telecommunications trade associations to develop a stand-alone broadband high-cost support mechanism, and was continuing to meet with the Wireline Competition Bureau regarding this matter.

Pursuant to Section 1.1206(b) of the Commission's Rules, this submission is being filed for inclusion in the public record of the referenced proceedings.

Respectfully submitted,

Gerard J. Duffy
WTA Regulatory Counsel

Blooston, Mordkofsky, Dickens, Duffy & Prendergast, LLP
2120 L Street NW (Suite 300)
Washington, DC 20037
Telephone: (202) 659-0830
Email: gjd@bloostonlaw.com

cc: Daniel Alvarez