



November 25, 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; Universal Service Contribution Methodology, WC Docket No. 06-122***

Dear Ms. Dortch:

On Thursday, November 21, 2013, members of the Board of Directors of NTCA–The Rural Broadband Association (“NTCA”) and staff of NTCA as listed in the attachment hereto (the “NTCA Representatives”) met with Commissioner Jessica Rosenworcel and her legal advisor, Christi Barnhart, regarding matters in the above-referenced proceedings.

The NTCA Representatives 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 (“CAF”) for RLECs. *See* Comments of NTCA, *et al.*, WC Docket No. 10-90 (filed June 17, 2013), at 1-10 and Attachment 1. We further discussed how such support would comport with the framework adopted for CAF support for price cap-regulated carriers in the 2011 reforms adopted by the Federal Communications Commission (the “Commission”), and the need too for universal service support that comports with the statutory requirements for sufficiency and takes into account the challenges of deploying and operating broadband-capable networks in unique and diverse high-cost areas.

We discussed as well, consistent with prior filings, the need for 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.

Marlene H. Dortch  
November 25, 2013  
Page 2 of 2

The NTCA Representatives further noted that robust, broadband-capable networks in rural areas will be essential to the mission of universal service in more ways than one. Specifically, in addition to the fact that many consumers are demanding increased capacity and speeds for broadband services, consumers' desire for wireless services will not be adequately satisfied in the absence of substantial fixed wireline connections that minimize spectrum challenges and are capable of handling the increasing amounts of data that will come across networks that are in fact hybrids of spectrum and wires. We observed as well that many applications and uses desired by consumers cannot and will not function without increased capacity over time in last-mile and middle-mile networks, and that rational contributions reform is thus very much-needed to ensure that all those who rely upon the presence of such networks in high-cost areas to deliver services and applications to such end users contribute equitably and responsibly to the deployment, upgrades, and upkeep of such networks over time.

Finally, we discussed the need to balance the understandable desire for accountability in the use of universal service distributions with a reasonable level of burden in imposing reporting requirements. Several NTCA Representatives discussed the time and expense associated with compiling and filing some of the new reports required by the 2011 reforms, and noted that many small companies necessarily must outsource such functions (at sizeable hourly rates) because they cannot afford to maintain staff resources for such purposes.

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: Commissioner Jessica Rosenworcel  
Christi Barnhart

**NTCA REPRESENTATIVES  
IN ATTENDANCE AT THURSDAY, NOVEMBER 21, 2013 MEETING**

Rhonda Armstrong	Sebastian (CA)
Doug Boone	Premier Communications (IA)
Bob DeBroux	TDS Telecom (WI)
James Dauby	PSC (IN)
Loren Duerksen	Diller Tel. Company (NE)
Terry Force	Blue Valley (KS)
Ben Foster	Twin Valley Tel (KS)
Mark Gailey	Totah Communications (OK)
Greg Hale	Logan Tel Coop (KY)
Kevin Hranicka	Van Buren Tel (IA)
James Kail	Laurel Highland Tel (PA)
Ron Laudner	Farmers Mutual d/b/a Omnitel Communications (IA)
Don Miller	Northwest Tel Coop (IA)
Mitch Moore	Clear Creek Mutual (OR)
Catherine Moyer	Pioneer Communications (KS)
Allen Russ	ATMC (NC)
Paul Schuetzler	Consolidated Telcom (ND)
Craig Smith	MGW Tel (VA)
Larry Windham	Progressive Rural Tel (GA)
Tom Young	Kingdom Tel (MO)
Fred Johnson	Farmers Telecom Coop (AL)
Don Richards	Richards, Elder & Green, LLP (TX)
Shirley Bloomfield	NTCA
Jennifer Sullivan	NTCA
Mike Romano	NTCA