



January 21, 2014

**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, 07-135 and 05-337; and CC Docket No. 96-45**

Dear Ms Dortch:

On Friday, January 17, 2014, Derrick Owens and Gerry Duffy representing WTA – Advocates for Rural Broadband (“WTA”) met with Nicholas Degani, Legal Advisor, Wireline, to Commissioner Ajit Pai, to speak generally regarding issues and alternative regulatory approaches related to Chairman Tom Wheeler’s announced intention to terminate the Quantile Regression Analysis (“QRA”) mechanism and benchmarks.

The WTA representatives reiterated WTA’s support for the Capital Budget Mechanism and Data Only Broadband proposals that have been jointly developed and submitted to the Commission by the rural telecommunications associations. They noted that WTA’s efforts continue to be focused upon predictable and sufficient high-cost support for its members and other rural local exchange carriers. These small businesses serve many of the nation’s most high-cost and difficult-to-reach rural areas, generally as carriers of last resort, and lack the resources, access to private capital markets, and economies of scope and scale to withstand disruptions and decreases in their critical universal service revenue streams.

The conversation also included general discussion of potential impacts and complications arising from matters such as the Tenth Circuit appeal, further universal service and intercarrier compensation rulemakings, and the TDM-to-IP transition and experiments. WTA advanced no specific proposals in these areas.

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,  
/s/ Gerard J. Duffy  
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