



February 26, 2014

**Ex Parte**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

Re: Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund, WC Dockets 10-90, 07-135, 05-337, 03-109, CC Dockets 01-92, 96-45, GN Docket 09-51, WT Docket 10-208

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Dear Ms. Dortch:

On Thursday, February 20, 2014, Jeff Lanning (CenturyLink), Malena Barzilai (Windstream), Mary Henze and Hank Hultquist (AT&T), Maggie McCready and David Haga (Verizon), Mike Skrivan (FairPoint) and I met with Carol Matthey, Alex Minard, Kim Scardino and Romanda Williams of the Wireline Competition Bureau.

Our discussion focused on eligible telecommunications carrier (ETC) status as the FCC moves forward to implement CAF Phase II in territories served by price cap carriers. The Commission raised a number of questions concerning this issue in the Further Notice attached to the *USF/ICC Transformation Order*.<sup>1</sup> We noted the Commission's goal of "ensur[ing] that obligations and funding are appropriately matched, while avoiding consumer disruption in access to communications services,"<sup>2</sup> and discussed how this can be achieved with the coming change from very broad geographic support under legacy programs to the CAF II program's targeting of universal service support to very narrow, discrete geographic areas for specifically defined services. We also discussed the approach adopted in the Commission's recent *Mobility Fund*

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<sup>1</sup> *Connect America Fund*, WC Docket No. 10-90, et al., 26 FCC Rcd 17663 (2011)(*USF/ICC Transformation Order*) at ¶¶ 1089-1102.

<sup>2</sup> *Id.* at ¶ 1089.

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*Phase I Order* that limited ETC obligations to specific geographic areas that would receive support and how this could be applied in the context of the CAF Phase II program.<sup>3</sup>

Pursuant to Commission rules, please include this ex parte letter in the above-identified proceeding.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jonathan Banks".

Jonathan Banks  
Senior Vice President, Law & Policy

c: Carol Matthey  
Alex Minard  
Kim Scardino  
Romanda Williams

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<sup>3</sup> *Connect America Fund*, WC Docket No. 10-90, et al., Second Report and Order, 27 FCC Rcd 7856 (2012)(*Mobility Fund Phase I Order*).