April 11, 2014

***Ex Parte* Notice**

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th 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 Wednesday, April 9, 2014, the undersigned, on behalf of NTCA–The Rural Broadband Association ("NTCA"), spoke via telephone with Daniel Alvarez, legal advisor to Chairman Tom Wheeler. I spoke with Julie Veach, Chief of the Wireline Competition Bureau, on April 10, 2014 regarding the same matters.

In both conversations, NTCA encouraged the Federal Communications Commission (the "Commission") to implement as soon as possible updates to the existing high-cost rules that strike an essential balance between preserving and advancing universal service in areas served by rural, rate-of-return-regulated local exchange carriers ("RLECs"). Such updates must ensure that predictable and sufficient support is available both for recovery of prior investments consistent with rules in place at the time those investments were made, and also for the additional future investments that are essential to ensure access by rural consumers to reasonably comparable services at reasonably comparable rates going forward. Such changes must be tailored to the challenges faced by smaller providers that operate exclusively in rural areas, crafted carefully to avoid disruptions in existing support through well-managed transitions, and must ensure that broadband-capable networks are eligible for support even if a given consumer might choose not to purchase voice telephony services that are (and still should be) required to be offered atop those networks. NTCA expressed its eagerness to engage in a more in-depth conversation with the Commission and its staff regarding the proposal that NTCA and other rural telecom stakeholders have submitted and potential paths forward to fulfill the mission of universal service faithfully and in all respects. *See, e.g.*, *Ex Parte* Letter from Michael R. Romano, Sr. Vice President-Policy, NTCA, to Marlene H. Dortch, Secretary, Federal Communications Commission (the "Commission"), WC Docket No. 10-90, *et al*., (filed March 31, 2014).

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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: Daniel Alvarez
Julie Veach