

ZIONS BANCORPORATION

July 29, 2014

Via Electronic Submission

Ms. Marlene Dortch
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WC Docket No. 10-208, Universal Service Reform – Mobility Fund

Dear Ms. Dortch,

On July 25, 2014, V. Noah Campbell of Radio Spectrum Group, LLC, consultant for Zions Bancorporation, met with Amy Bender of Commissioner O’Rielly’s staff regarding the usage of credit ratings for determining eligible banks that may issue Letters of Credit for purposes of supporting participants in Connect America Fund and other upcoming projects, including the allocation of 3.5GHz spectrum in the proposed Citizens Radio Broadband Service.

Zions emphasized that guidelines for such acceptable lending entities under the CAF Experiments project, which include a shift from the A- or better credit rating requirement used for Mobility Fund Phase I, will streamline compliance for CAF participants and regulators without increasing risk for public funds. Zions pointed out that, as with CAF Experiments participants, many grantees of future CAF projects are likely to be smaller, rural entities that more often bank with regional banks such as Zions. By allowing winning bidders to acquire Letters of Credit from banks that meet the BBB- credit rating standard while holding assets that place them among the top-100 largest banks in the United States (should such winning bidder choose a US bank, as there are different rules for foreign banks), the Commission is making it easier for small telecommunications providers to draw-down grant funds, thus supporting the overall goal of the CAF program.

In addition to pointing out the benefits stemming from use of the BBB- standard in future LOC required projects, Zions provided information to the Commission regarding the strength of Zions as a financial institution. Furthermore, Zions suggested that the BBB- credit rating standard would be similarly beneficial in the upcoming Citizens Broadband Radio Service licensing regime, while also creating certainty for banks, grantees and regulators. Zions recommended that this standard be employed for banks in Mobility Phase II, CAF Phase II, Tribal Mobility Phase II, and any other project that requires participants to obtain Letters of Credit.

In short, Zions submits that the BBB- credit rating for banks issuing Letters of Credit for CAF Experiments and future projects where Letters of Credit are used to secure public funds help promote purpose of the CAF program.

Sincerely,

A handwritten signature in black ink, appearing to read 'James Abbott', with a long horizontal flourish extending to the right.

James Abbott