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August 5, 2014

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

Dear Ms. Dortch:

On August 1, 2014, Steve Morris and I on behalf of the National Cable & Telecommunications Association (NCTA), and Alex Hoehn-Saric and Christianna Barnhart of Charter Communications met with Carol Matthey, Ryan Yates, Suzanne Yellen, Alex Minard, and Mark Walker of the Wireline Competition Bureau to discuss the petition for reconsideration filed by the American Cable Association and NCTA in the above-referenced proceeding.¹ Specifically, we raised concerns with the newly-adopted requirement that parties must have current or previous customers in a census block to certify that they serve that block.

We explained to the Bureau that the inability of a provider to produce a specific customer record does not conclusively demonstrate that the provider is not offering service in a particular census block. In particular, we explained that our cable operator member companies are finding a significant number of census blocks for which they have deployed facilities and are marketing service, but for which they do not have, or cannot locate, a specific customer record. There are a variety of reasons why there may be no customer records for census blocks served by a cable operator. For example, the operator may have deployed plant in newly-established subdivisions for which no customer has yet been signed up for service. Alternatively, the operator may be unable to locate records of past customers due to mistaken entries in customer billing records (e.g., the customer lived on Smith Street but the billing database incorrectly lists the address as Smit Street), or billing records of acquired companies may not track back for a sufficient period of time or may be stored in formats that do not match a company's other databases, or that are not easily searchable.

We urged the Bureau to treat current or former customer information as persuasive evidence that a census block is served, but not as a prerequisite to certifying that a provider offers service within a census block during the challenge process. So long as a provider is offering service within a census block, has deployed network facilities to that census block, and

¹ Petition for Reconsideration of the American Cable Association and the National Cable & Telecommunications Association, WC Docket No. 10-90 (July 21, 2014) (Petition).

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is able to serve a customer within 7-10 business days of a request, universal service money should not be provided to an incumbent phone company to serve the same census block.

Respectfully submitted,

/s/ Jennifer K. McKee

Jennifer K. McKee

cc: C. Matthey
R. Yates
S. Yellen
A. Minard
M. Walker