



August 20, 2014

***Ex Parte Notice***

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

**Re: *Connect America Fund, WC Docket No. 10-90; Universal Service Reform – Mobility Fund, WT Docket No. 10-208; ETC Annual Reports and Certification, WC Docket No. 14-58; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; Developing an Unified Inter-carrier Compensation Regime, CC Docket No. 01-92***

Dear Ms. Dortch:

On Monday, August 18, 2014, the undersigned, on behalf of NTCA–The Rural Broadband Association (“NTCA”), met separately with: (1) Daniel Alvarez, legal advisor to Chairman Tom Wheeler; (2) Nicholas Degani, legal advisor to Commissioner Ajit Pai; (3) Rebekah Goodheart, legal advisor to Commissioner Mignon Clyburn; and (4) Priscilla Delgado Argeris, legal advisor to Commissioner Jessica Rosenworcel, to discuss matters in the above-referenced proceedings.

During each meeting, I discussed updates to the existing high-cost rules for areas served by rural, rate-of-return-regulated local exchange carriers consistent with comments recently filed by NTCA and other rural telecom stakeholders (the “Rural Associations”). *See* Comments of NTCA, *et al.*, WC Docket No. 10-90, *et al.* (filed Aug. 8, 2014), at 6-28 and 34-60. NTCA highlighted in particular the updated proposals of the Rural Associations in those comments in direct response to the objectives of reform outlined by the Federal Communications Commission (the “Commission”) in paragraphs 267 to 269 of its most Further Notice of Proposed Rulemaking in the above-referenced dockets. *Connect America Fund, WC Docket No. 10-90, et al.*, Report and Order, Declaratory Ruling, Order, Memorandum Opinion and Order, Seventh Order on Reconsideration, and Further Notice of Proposed Rulemaking, FCC 14-54 (rel. June 10, 2014). NTCA urged the Commission to review the detailed recommendations and responses as cited above in the Rural Associations’ comments, and expressed an interest in further discussions regarding these reform issues in the very near future – with an aim toward implementing as soon as possible a well-constructed transition away from legacy support mechanisms to a simple and straightforward new mechanism focused on supporting broadband-capable networks in high-cost areas served by smaller carriers.

Marlene H. Dortch

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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  
Nicholas Degani  
Rebekah Goodheart  
Priscilla Delgado Argeris