



July 30, 2018

***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; ETC Annual Reports and Certifications, WC Docket No. 14-58; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92***

Dear Ms. Dortch:

On Friday, July 27, 2018, the undersigned on behalf of NTCA–The Rural Broadband Association (“NTCA”) spoke via telephone with Jay Schwarz, Wireline Advisor to Chairman Ajit Pai, regarding matters in the above-referenced proceedings.

First, consistent with prior advocacy, NTCA discussed the need for action by the Federal Communications Commission (the “Commission”) with respect to the rate floor policy that remains under consideration in the wake of a notice of proposed rulemaking last year. *See Connect America Fund, WC Docket No. 10-90, Notice of Proposed Rulemaking and Order (rel. May 19, 2017); Comments of NTCA, WC Docket No. 10-90 (filed July 10, 2017).*

Second, NTCA discussed questions related to the recently released order setting forth standards and requirements for performance testing by recipients of high-cost universal service fund (“USF”) support. In particular, NTCA raised questions regarding the number of test locations and the required extent of network testing, consistent with prior advocacy. *See Ex Parte Letter from Joshua Seidemann, Vice President of Policy, NTCA, to Marlene H. Dortch, Secretary, Commission, WC Docket No. 10-90 (filed June 18, 2018).* NTCA also discussed the timing of implementation for smaller operators, and indicated that it may also have several further questions for clarification forthcoming.

Finally, NTCA thanked the Commission for its efforts earlier this year to address certain concerns related to the sufficiency of high-cost USF support, and encouraged the Commission to complete work on its pending rulemaking as soon as possible so that broadband providers can make effective plans for network investments in 2019 and beyond. *See Connect America Fund, WC Docket No. 10-90, et al., Report and Order, Third Order on Reconsideration, and Notice of Proposed Rulemaking (rel. March 23, 2018).*

Marlene H. Dortch

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Thank you for your attention to this correspondence. Pursuant to Section 1.1206 of the rules of the Commission, a copy of this letter is being filed via ECFS.

Sincerely,

/s/ Michael R. Romano

Michael R. Romano

Senior Vice President –

Industry Affairs & Business Development

cc: Jay Schwarz