



February 13, 2020

VIA ECFS

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 Tuesday, February 11, 2020, Jeff Olson, General Manager of Red River Rural Telephone Association dba Red River Communications (“Red River”), Tom Campbell of Olson Thielen, and the undersigned on behalf of NTCA–The Rural Broadband Association (“NTCA”) met separately with: (1) Preston Wise, rural broadband advisor to Chairman Ajit Pai; (2) Arielle Roth, wireline legal advisor to Commissioner Michael O’Rielly; (3) Joseph Calascione, wireline legal advisor to Commissioner Brendan Carr; and (4) Travis Litman, chief of staff to Commissioner Jessica Rosenworcel. On Wednesday, February 12, 2020, we met with Austin Bonner, wireline legal advisor to Commissioner Geoffrey Starks.

In each meeting, we discussed Red River’s pending waiver petition with respect to a reduction in universal service support under the Alternative Connect America Cost Model (“ACAM”) resulting from an inadvertent erroneous submission by a neighboring operator that reflected broadband coverage on the basis of census tracts rather than census blocks. We described how this error was brought to the attention of the Federal Communications Commission (the “Commission”) upon discovery by Red River as it evaluated potential ACAM elections in mid-2019, how there had been no need for a “challenge” process in this instance because the neighboring operator acknowledged the error once brought to its attention, and how the waiver petition and all of this undisputed information related to the issue were submitted to the Commission prior to Red River’s ultimate election of ACAM support (subject to the reservations stated in the waiver petition). Red River urged the Commission to grant the requested waiver for good cause and provide the level of support that would have been available but for this error in light of these facts and the need for Red River to upgrade equipment and repay loans associated with deployments in the affected areas.

Marlene H. Dortch

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Thank you for your attention to this correspondence. Materials provided to Commission representatives in the meetings are attached hereto. 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 –

Industry Affairs & Business Development

NTCA–The Rural Broadband Association

Enclosures

cc: Preston Wise
Arielle Roth
Joseph Calascione
Travis Litman
Austin Bonner