



January 26, 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***

Dear Ms. Dortch:

On Thursday, January 25, 2018, the undersigned, on behalf of NTCA–The Rural Broadband Association (“NTCA”), met separately with Amy Bender, wireline legal advisor to Commissioner Michael O’Rielly, and Jaime Susskind, chief of staff to Commissioner Brendan Carr, to discuss matters in the above-referenced proceeding.

NTCA expressed appreciation for the recent announcement that the Federal Communications Commission (the “Commission”) is considering measures to improve the workings of the high-cost universal service fund (“USF”) programs that support the availability and affordability of voice and broadband services in rural areas served by smaller operators. NTCA specifically urged the Commission to take steps to address near-term high-cost USF sufficiency concerns and other outstanding issues that have either been presented for reconsideration or were raised in prior notices of proposed rulemaking, while also teeing up for further consideration longer-term questions related to the sufficiency of high-cost USF programs and seeking comment on the prospect of additional targeted changes that could help make the already-reformed programs operate even more effectively. NTCA advocacy in support of action with respect to these issues was consistent with its prior filings in this proceeding. *See* NTCA Petition for Reconsideration and/or Clarification, WC Docket No. 10-90, *et al.* (filed May 25, 2016), at 2-11, 20-21, and 23-24 (addressing sufficiency concerns, estimation of certain standalone broadband costs, operating expense limitation issues, and imputation of certain charges); Comments of NTCA, WC Docket No. 10-90 (filed Feb. 13, 2017), at 2-10 (urging additional model-based and cost-based USF support); *Ex Parte* Letters from Michael R. Romano, Sr. Vice President, NTCA, to Marlene H. Dortch, Secretary, Commission, WC Docket No. 10-90 (filed Feb. 3, 2017) (highlighting a “punchlist” of issues that required action to promote the effectiveness of USF reforms); (filed Aug. 15, 2017) (identifying impacts on consumer rates and investment arising out of USF budget insufficiency and suggesting certain remedies therefor); and (filed Dec. 20, 2017) (proposing prospective limits on recovery of specifically identified categories of expenses).

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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: Amy Bender  
Jamie Susskind