



November 29, 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 Tuesday, November 27, 2018, the undersigned on behalf of NTCA–The Rural Broadband Association (“NTCA”) met separately with: (1) Arielle Roth, wireline legal advisor, and Kagen Depain, legal intern, from the office of Commissioner Michael O’Rielly; (2) Jamie Susskind, chief of staff for Commissioner Brendan Carr; and (3) Travis Litman, chief of staff for Commissioner Jessica Rosenworcel.

In each of the meetings, NTCA expressed strong support for the draft order with respect to universal service fund (“USF”) support circulated recently for a potential vote by the Federal Communications Commission (the “Commission”) at its December open meeting. NTCA observes that the draft order as currently designed would take substantial steps toward fulfillment of statutory mandates with respect to predictability and sufficiency, promote the effectiveness of existing USF support mechanisms, and achieve important public policy objectives with respect to promoting network investment and ensuring the availability of services for the benefit of consumers on a reasonably comparable basis between rural and urban areas. During the meetings, NTCA also discussed verification of Form 477 data in connection with accurately confirming the extent of any competitive overlap, proper calibration of buildout obligations to reflect increased speed targets, changes to the budget control mechanism calculation and the per-line cap on cost-based support, and pending petitions for reconsideration with respect to model-based support.

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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 –
Industry Affairs & Business Development

cc: Travis Litman
Arielle Roth
Jamie Susskind
Kagen Despain