

December 4, 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, November 30, 2018, the undersigned on behalf of NTCA–The Rural Broadband Association ("NTCA") spoke via telephone with Arielle Roth, wireline legal advisor to Commissioner Michael O'Rielly.

During the conversation, 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 maintains 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. As part of the conversation, NTCA also discussed verification of Form 477 data in connection with accurately confirming the extent of any competitive overlap and the operation of budget controls over time.

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,

<u>/s/ Michael R. Romano</u> Michael R. Romano Senior Vice President – Industry Affairs & Business Development

cc: Arielle Roth