



February 11, 2019

***Ex Parte Notice***

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**RE: *Updating the Intercarrier Compensation Regime to Eliminate Access Arbitrage, WC Docket No. 18-155; 8YY Access Reform, WC Docket No. 18-156***

Dear Ms. Dortch:

On Friday, February 8, 2019, the undersigned on behalf of NTCA–The Rural Broadband Association (“NTCA”) met with Nirali Patel, wireline advisor to Chairman Ajit Pai, to discuss matters in the above-referenced proceedings.

Specifically, NTCA urged the Federal Communications Commission (the “Commission”) to confine any action with respect to intercarrier compensation only to those areas in which clear and convincing evidence on the record confirms concerns exist with respect to particular practices or routing patterns. To this end, NTCA suggested greater analysis and additional evidence are needed to establish where such concerns arise specifically and to target and tailor solutions for such concerns prior to adoption of any order in these proceedings. Nonetheless, NTCA indicated that if the Commission will proceed to address perceived arbitrage in the context of transport charges in particular, it should proceed consistent with NTCA’s prior recommendations. *See* Comments of NTCA, WC Docket No. 18-155 (filed July 20, 2018); Reply Comments of NTCA, WC Docket No. 18-155 (filed Aug. 3, 2018).

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: Nirali Patel