



March 4, 2019

***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, February 28, 2019, the undersigned on behalf of NTCA–The Rural Broadband Association (“NTCA”) spoke via telephone with Justin Faulb, legal advisor in the Wireline Competition Bureau, to discuss matters in the above-referenced proceeding.

During our conversation, NTCA expressed concern regarding the accuracy of Form 477 information that will be used for purposes of distributing universal service fund (“USF”) support. NTCA encouraged the Federal Communications Commission (the “Commission”) to ensure that “false positives” generated by reliance upon such information will neither deter or preclude potential elections of and migration to model-based support, nor reduce or eliminate essential support for those providers – and their consumers – continuing to depend upon cost-based USF mechanisms for access to voice and broadband services.

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: Justin Faulb