



October 6, 2020

VIA ECFS

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 Monday, October 5, 2020, Tom Steinolfson and Jeff Olson from Red River Rural Telephone Association dba Red River Communications (“Red River”), David Crothers from the Broadband Association of North Dakota, Tom Campbell from Olson Thielen, and the undersigned on behalf of NTCA–The Rural Broadband Association (“NTCA”) held separate telephone conversations with: (1) Arielle Roth, wireline legal advisor to Commissioner Michael O’Rielly; and (2) Austin Bonner, wireline legal advisor to Commissioner Geoffrey Starks.

In each meeting, we discussed Red River’s July 2019 waiver petition with respect to a reduction in universal service support under the Alternative Connect America Cost Model (“ACAM”) resulting from an erroneous submission by a neighboring operator that mistakenly reflected broadband coverage on the basis of census tracts rather than census blocks. *See* Petition for Waiver of Red River, WC Docket No. 10-90, *et al.* (filed July 11, 2019). We described how this error was brought to the attention of the Federal Communications Commission (the “Commission”) prior to the ACAM election deadline, how there had been no need for a “challenge” process in this instance because the neighboring operator acknowledged the error in writing to the Commission prior to that deadline, and how the waiver petition and all undisputed information related to the issue were submitted to the Commission prior to Red River’s ultimate election of ACAM support (subject to the reservations stated in the waiver petition). We observed that the record showed only support for the grant of relief, and that there was also support from the community and members of Congress. Red River therefore renewed its request that the Commission promptly grant the still-pending waiver for good cause and in light of the unique circumstances presented, and thereby provide the level of support that would have been available but for the other provider’s error given the need for Red River to upgrade equipment and repay loans associated with deployments in the affected areas.

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To aid in yesterday's discussions, materials supplied to Commission representatives during February *ex parte* meetings and filed with the Commission previously were provided once again by Red River. *See Ex Parte* Letter from Michael R. Romano, Sr. Vice President, NTCA, to Marlene H. Dortch, Secretary, Commission, WC Docket No. 10-90, *et al.* (Feb. 13, 2020).

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

NTCA–The Rural Broadband Association

cc: Arielle Roth
Austin Bonner