



April 24, 2023

Ex Parte Notice

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

RE: *Connect America Fund, WC Docket No. 10-90; ETC Annual Reports and Certifications, WC Docket No. 14-58; Telecommunications Carriers Eligible to Receive Universal Service Support, WC Docket No. 09-197; Connect America Fund – Alaska Plan, WC Docket No. 16-271; Expanding Broadband Service Through the A-CAM Program, RM-11868*

Dear Ms. Dortch:

On Friday, April 21, 2023, the undersigned on behalf of NTCA–The Rural Broadband Association (“NTCA”) spoke with Danielle Thumann, legal advisor to Commissioner Brendan Carr, regarding matters in the above-referenced proceedings.

During the conversation, I highlighted proposed updates of the Connect America Fund Broadband Loop Support (“CAF-BLS”) and High-Cost Loop Support mechanisms that NTCA submits are ready for adoption by the Federal Communications Commission (the “Commission”) as a matter of substance and process based upon the record of these proceedings. Although several other measures proposed by NTCA and other parties – such as “incentive regulation” options and the need to care for unique challenges in serving tribal areas – may warrant additional consideration through a further notice of proposed rulemaking, I specifically noted the following three targeted proposals by NTCA for which there is substantial long-standing support in the record that would justify adoption now: (1) recalibrating the BCM at the current level of demand; (2) recalculating the existing rule formulas for CAF-BLS deployment at 100/20 Mbps; and (3) offering a voluntary opportunity for CAF-BLS recipients elect to deliver at least 100/20 Mbps broadband to every serviceable location in their study areas on a time frame comparable to BEAD commitments in exchange for relief from the BCM for five years.¹ NTCA reiterated its request that the Commission act upon these specific updates in an order in the near-term, as well as acting as soon as possible to implement enhancements to the Alternative Connect America Cost Model.

¹ See, e.g., *Ex Parte* Letter from Michael R. Romano, Executive Vice President, NTCA, to Marlene H. Dortch, Secretary, Commission, WC Docket No. 10-90, *et al.* (filed Apr. 21, 2023), at 2-7; *Ex Parte* Letter from Michael R. Romano, Executive Vice President, NTCA, to Marlene H. Dortch, Secretary, Commission, WC Docket No. 10-90, *et al.* (filed Dec. 5, 2022), at 2-4; *Ex Parte* Letter from Michael R. Romano, Executive Vice President, NTCA, to Marlene H. Dortch, Secretary, Commission, WC Docket No. 10-90, *et al.* (filed Oct. 14, 2022), at 2-4; Comments of NTCA, WC Docket No. 10-90, *et al.* (filed July 18, 2022), at ii, 34-41.

Marlene H. Dortch

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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 Romano

Michael Romano

Executive Vice President

cc: Danielle Thumann