



May 15, 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, May 12, 2023, the undersigned on behalf of NTCA–The Rural Broadband Association (“NTCA”) spoke with Elizabeth Cuttner from the office of Chairwoman Jessica Rosenworcel regarding matters in the above-referenced proceedings.

Consistent with prior advocacy, I urged the Federal Communications Commission (the “Commission”) to provide relief and recalibrate the budget control mechanism for the Connect America Fund Broadband Loop Support (“CAF-BLS”) and High-Cost Loop Support (“HCLS”) mechanisms at the current level of demand, to recalculate the existing formulas for service level commitments under CAF-BLS at 100/20 Mbps, and to provide a voluntary option for more stable CAF-BLS and HCLS support in exchange for a study area-wide commitment to deliver at least 100/20 Mbps.¹

I also emphasized the need for the Commission to employ realistic, engineering-backed assessments in identifying areas in need of CAF-BLS/HCLS and Alternative Connect America Cost Model support to ensure that universal service will be achieved and sustained, in lieu of relying upon assertions of competitive capability to serve individual locations without consideration as to the ability to serve *all* locations in that geography.²

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. 28, 2023); *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. 20, 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.

² 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. 20, 2023), at 6-7.

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: Elizabeth Cuttner