



June 4, 2025

***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; In Re: Delete, Delete, Delete, GN Docket No. 25-133; Technology Transitions, GN Docket No. 13-5***

Dear Ms. Dortch:

On Tuesday, June 3, 2025, the undersigned on behalf of NTCA–The Rural Broadband Association (“NTCA”) spoke with Danielle Thumann, Senior Counsel to Chairman Brendan Carr, regarding matters in the above-referenced proceedings.

The conversation first addressed a recent submission by NTCA and other stakeholders regarding implementation of adjustments to universal service support disbursed through the Enhanced Alternative Connect America Model (“Enhanced ACAM”). *See Ex Parte* Letter from Genevieve Morelli, ACAM Broadband Coalition, *et al.*, WC Docket No. 10-90, *et al.* (filed May 30, 2025). Consistent with this filing, NTCA urged the Federal Communications Commission (the “Commission”) to confirm that “obligated locations” will be used in triggering the threshold for support reductions, and expressed the importance of avoiding volatility in adjustments in a manner that could undermine the fulfillment of program objectives and the furtherance of universal service.

NTCA next addressed the deletion and/or pruning of rules that are outdated or impose substantial burdens on providers. In particular, consistent with prior comments, NTCA discussed potential opportunities for thoughtful but meaningful streamlining of historic cost accounting rules in the Code of Federal Regulations. *See* Comments of NTCA, GN Docket No. 25-133 (filed Apr. 11, 2025), at 2-6.

Finally, NTCA thanked the Commission for its recent attention to technology transition issues and highlighted the need for further examination of other aspects of these transitions. NTCA focused particularly on how a lack of clarity in existing regulations and certain economic and technical interconnection concerns impede smaller rural providers from offering IP-based functionality to consumers – even where such capabilities already reside within the vast majority of these networks. NTCA expressed interest in offering proposals regarding how current rules can be clarified, modified, or deleted to encourage transitions of underlying network technology that deliver reliable and seamless connectivity and greater benefits for consumers in rural and urban areas alike.

Marlene H. Dortch

June 4, 2025

Page 2 of 2

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