



February 2, 2015

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, January 29, 2015, the undersigned on behalf of NTCA–The Rural Broadband Association (“NTCA”), together with Tom Conry from Farmers Mutual Cooperative Telephone Company, David Duncan from the Iowa Communications Alliance, Robert Gannon from Westel Systems, Kyle Manders from Bernard Telephone Company, and Joseph Snyder from Citizens Mutual Telephone Cooperative met with Carol Matthey, Steve Rosenberg, Ted Burmeister, Talmage Cox, Katie King, Alexander Minard, Joseph Sorresso, Mark Walker, and Suzanne Yelen of the Wireline Competition Bureau to discuss matters in the above-referenced proceeding.

Specifically, we discussed the prospect for and potential impacts of the voluntary availability of model-based universal service support for rural, rate-of-return-regulated local exchange carriers (“RLECs”). We discussed in particular the need to ensure careful coordination of any optional model-based paths for support with possible effects on RLECs that do not or cannot avail themselves of such an option. We also raised the need to recognize throughout universal service policy more generally the nature of serving areas (*e.g.*, rural, exurban, suburban, or urban) that are reasonably proximate to more granular areas for which support would be received. *See Ex Parte* Letter from Michael R. Romano, Sr. Vice President – Policy, NTCA, to Marlene H. Dortch, Secretary, Federal Communications Commission (the “Commission”), WC Docket Nos. 10-90 and 05-337, GN Docket Nos. 12-353 and 13-5 (filed Sept. 12, 2013), at 2 and final attachment (discussing issues for resolution in connection with voluntary participation in model-based support mechanisms). Finally, we raised questions relating to technical assumptions that may affect any estimates of the costs of delivering services in rural areas.

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 R. Romano

Michael R. Romano

Senior Vice President – Policy

cc: Carol Matthey
Steve Rosenberg
Ted Burmeister
Talmage Cox
Katie King
Alexander Minard
Joseph Sorresso
Mark Walker
Suzanne Yelen