



February 4, 2016

***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, February 4, 2016, the undersigned on behalf of NTCA–The Rural Broadband Association (“NTCA”) spoke via telephone with Stephanie Weiner, legal advisor to Chairman Tom Wheeler.

During the conversation, I emphasized the importance of avoiding a “black hole” of cost recovery whereby existing Federal Communications Commission (the “Commission”) rules require assignment of certain kinds of costs to the interstate jurisdiction but then other, new rules preclude any opportunity for recovery of such costs. For example, I noted that certain interstate common line costs may become unrecoverable through universal service support by operation of a “budget control” that is applied to them or as a result of reductions in support associated with census blocks in which the Commission determines sufficient competitive overlap exists. In such cases, the Commission’s rules must by law provide for at least the opportunity to recover those costs elsewhere – if not via universal service due to rule changes, then from customers via a new, additional interstate rate element.

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: Stephanie Weiner