



February 10, 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:

NTCA–The Rural Broadband Association and USTelecom hereby file an amended proposal with respect to how a given rate-of-return-regulated rural local exchange carrier (“RLEC”) should be allowed to choose on a voluntary basis from among simple alternatives for purposes of any potential buildout commitments that may be adopted in this proceeding. Specifically, each RLEC should be able to voluntarily elect to utilize in such context: (1) the average cost per loop of all RLECs with comparable density levels that have at least 10/1 broadband deployed to more than 95% of the locations they serve (the “95% Deployed Density Peer Group”); provided, however, that if an RLEC’s actual cost per loop is higher than this average cost per loop of this 95% Deployed Density Peer Group, the per-loop cost for that RLEC for these purposes should be *at least* 150% of the average cost per loop of those RLECs with comparable density levels that have at least 10/1 broadband deployed to the same tier; or (2) the cost per loop reflected for that RLEC in the final version of the Alternative Connect America Cost Model. The Federal Communications Commission (the “Commission”) should also include in any order related to this subject matter an express recognition that: (a) other options for establishing cost per loop will be considered in a further notice of proposed rulemaking, including whether the adjustment described above should in fact be greater than 150% due to cost factors of locations left to be served; and (b) each RLEC will be permitted to file with the Commission to show if its remaining locations to be served are of materially higher cost than these methods would yield, and thereby enable the use of a more appropriate alternative cost per loop reflective of the costs to reach such locations.

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