



February 24, 2014

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; High-Cost Universal Service Support, WC Docket No. 05-337; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition; Petition of the National Telecommunications Cooperative Association for a Rulemaking to Promote and Sustain the Ongoing TDM-to-IP Evolution, GN Docket No. 12-353; Technology Transitions Policy Task Force, GN Docket No. 13-5*

Dear Ms. Dortch:

On Thursday, February 20, 2014, the undersigned, on behalf of NTCA–The Rural Broadband Association (“NTCA”), held separate meetings with: (1) Nicholas Degani, legal advisor to Commissioner Ajit Pai; (2) Priscilla Delgado Argeris, legal advisor to Commissioner Jessica Rosenworcel; and (3) Rebekah Goodheart, legal advisor to Commissioner Mignon Clyburn, respectively, to discuss certain matters in the above-referenced proceedings. The undersigned also met on Friday, February 21, 2014, with Amy Bender, legal advisor to Commissioner Michael O’Rielly, to discuss the same matters.

In each meeting, I urged the Federal Communications Commission (the “Commission”) to take prompt action, consistent with the statements of Chairman Wheeler, to cease use of the unpredictable and opaque quantile regression analysis-based caps that have chilled lending and investment in connection with the deployment of broadband networks by rural rate-of-return regulated local exchange carriers. I also encouraged the Commission to take action, consistent with prior advocacy, to address the flash-cut elimination of Safety Net Additive support for companies that qualified based upon investments made in 2010 and 2011. Finally, consistent with the same prior advocacy, I urged the Commission to move forward without delay on updating legacy high-cost support rules to promote the affordability and availability of quality voice and broadband services on supported networks, and to avoid then reintroducing yet more regulatory uncertainty that once again deters lending and investment for rural broadband through further consideration of certain proposals raised in the 2011 Further Notice of Proposed Rulemaking on high-cost universal service issues. *See, e.g., Ex Parte* Letter from Michael R. Romano, Sr. Vice President, NTCA, to Marlene H. Dortch, Secretary, Commission, WC Docket No. 10-90, *et al.* (filed Nov. 19, 2013).

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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: Priscilla Delgado Argeris
Amy Bender
Nicholas Degani
Rebekah Goodheart