

March 18, 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 Friday, March 14, 2014, the undersigned, on behalf of NTCA–The Rural Broadband Association ("NTCA"), spoke with Carol Mattey of the Wireline Competition Bureau to discuss certain matters in the above-referenced proceedings.

Specifically, we discussed recent filings made by NTCA and other associations representing rural rate-of-return-regulated local exchange carriers ("RLECs") in connection with their proposal to update universal service support. *See, e.g., Ex Parte* Letter from Michael R. Romano, Sr. Vice President – Policy, NTCA, to Marlene H. Dortch, Secretary, Commission, WC Docket No. 10-90, *et al.* (filed Nov. 26, 2013); *Ex Parte* Letter from Michael R. Romano, Sr. Vice President – Policy, NTCA, to Marlene H. Dortch, Secretary, Commission, WC Docket No. 10-90, *et al.* (filed Dec. 16, 2013); *Ex Parte* Letter from Michael R. Romano, Sr. Vice President – Policy, NTCA, to Marlene H. Dortch, Secretary, Commission, WC Docket No. 10-90, *et al.* (filed Dec. 16, 2013); *Ex Parte* Letter from Michael R. Romano, Sr. Vice President – Policy, NTCA, to Marlene H. Dortch, Secretary, Commission, WC Docket No. 10-90, *et al.* (filed Dec. 16, 2013); *Ex Parte* Letter from Michael R. Romano, Sr. Vice President – Policy, NTCA, to Marlene H. Dortch, Secretary, Commission, WC Docket No. 10-90, *et al.* (filed Dec. 16, 2013); *Ex Parte* Letter from Michael R. Romano, Sr. Vice President – Policy, NTCA, to Marlene H. Dortch, Secretary, Commission, WC Docket No. 10-90, *et al.* (filed March 5, 2014).

NTCA reiterated the firm commitment of RLECs and their representatives to engage in in-depth, productive conversations with the Federal Communications Commission (the "Commission") and its staff regarding ways to achieve such updates in a manner that are both consistent with the principles announced in the 2011 reform order and also ensure that such updates: (1) are tailored for smaller RLEC operations; (2) recognize the unique challenges associated with being a small network operator serving only rural areas; and (3) do not require complex rule changes, unpredictable shifts, or wholesale disruptions in the way in which small carriers recover the costs of providing universal service to rural consumers. NTCA and its members remain eager for the opportunity to engage in such interactive discussions and to consider what steps might be necessary to serve all of these principles and objectives.

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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,

<u>/s/ Michael R. Romano</u> Michael R. Romano Senior Vice President – Policy

cc: Carol Mattey