



March 21, 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 Wednesday, March 19, 2014, the undersigned, on behalf of NTCA–The Rural Broadband Association, and Denny Law, General Manager and Chief Executive Officer of Golden West Telecommunications, met with Matthew DelNero, Deputy Chief of the Wireline Competition Bureau, to discuss certain matters in the above-referenced proceedings.

Specifically, we discussed the substantial efforts made by Golden West and other rural rate-of-return-regulated local exchange carriers (“RLECs”) to deliver on the promise of technological and IP-enabled network evolution in hard-to-serve rural areas. Golden West described how it has already deployed IP technology within its network from customer premise to network core, and the steps that it has taken to ensure service quality and the best possible consumer experience in connection with the company’s services as part of this transition. We noted that, from a values perspective, technology transitions within networks and the services they enable should be additive to a positive consumer experience. We discussed in particular the deep commitment of RLECs like Golden West to “carrier-grade IP,” and urged the Federal Communications Commission (the “Commission”) to reject any path that would use technology transitions and IP conversion as an excuse to sanction lower end-to-end quality of service, less choice in quality voice *and* broadband services, or diminished customer expectations.

We further noted that much of the progress toward an IP-evolved world has been made within, and due at least in part to, the existence of regulatory frameworks that help to define the “rules of the road” for how carriers interact and interconnect with one another and what consumers can expect from their service providers. While portions of these regulatory frameworks need modernization – for example, universal service rules that preclude reasonable consumer choice among quality voice and broadband products are illogical in an increasingly IP-enabled world – these frameworks generally can and should form an important foundation for sustained progress.

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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: Matthew DelNero