

March 31, 2014

## Ex Parte Notice

Ms. Marlene H. Dortch, Secretary Federal Communications Commission 445 12<sup>th</sup> 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; Technological Transition of the Nation's Communications Infrastructure, GN Docket No. 12-353; Technology Transitions Policy Task Force, GN Docket No. 13-5

Dear Ms. Dortch:

By this letter, NTCA–The Rural Broadband Association ("NTCA"), the National Exchange Carrier Association, the United States Telecom Association, and WTA-Advocates for Rural Broadband (collectively, the "Associations") submit further information in response to questions from Federal Communications Commission ("Commission") staff regarding the Associations' proposal for a targeted Connect America Fund ("CAF") program to refine and update universal service support mechanisms in areas served by rate-of-return-regulated rural local exchange carriers ("RLECs"). This latest submission is itself a supplement to materials that have been provided in a series of filings over the past several months. *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 R. Romano, Sr. Vice President – Policy, NTCA, to Marlene R. Romano, Sr. Vice President – Policy, NTCA, to Marlene R. Romano, Sr. Vice President – Policy, NTCA, to Marlene H. Dortch, Secretary, Commission, WC Docket No. 10-90, *et al.* (filed Feb. 19, 2014); *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 Feb. 19, 2014); *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 Feb. 19, 2014); *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 Feb. 19, 2014); *Ex Parte* Letter from Michael R. Romano, Sr. Vice President – Policy, NTCA, to Marlene H. Dortch, Secretary, Commission, WC Docket No. 10-90 (filed March 5, 2014).

The Associations appreciate the ongoing work of the Commission and staff in considering this proposal, and we are eager to complete productive conversations regarding the development of a CAF program that: (1) is tailored for smaller company operations; (2) recognizes the unique challenges associated with being a small network operator serving only rural areas; and (3) does 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. We remain hopeful that, in light of the Commission's clear commitment to promoting and sustaining technological evolution, the Commission will move quickly to implement the pending CAF proposal to help fulfill that vision for all rural consumers based upon the full breadth of data and analysis provided to assess this proposal.

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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

Enclosure

cc: Carol Mattey Steve Rosenberg Kalpak Gude Deena Shetler Erin Boone Randy Clarke Talmage Cox Alexander Minard Gilbert Smith Joe Sorresso Suzanne Yelen Chin Yoo