



April 25, 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; ETC Annual Reports and Certifications, WC Docket No. 14-58; Developing a Unified Inter-carrier Compensation Regime, CC Docket No. 01-92***

Dear Ms. Dortch:

On Thursday, April 21, 2016, the undersigned on behalf of NTCA–The Rural Broadband Association (“NTCA”) spoke via telephone with Carol Matthey, Alexander Minard, and Suzanne Yelen of the Wireline Competition Bureau.

During this conversation, NTCA discussed the fact that the Alternative Connect America Model (“A-CAM”) treats neighboring incumbent local exchange carriers (“ILECs”) in a “shared” census block as competitors (or otherwise attributes deployment to the other) even when those ILECs operate in distinct parts of that census block and there is in fact no geographic overlap between them. NTCA appreciates the desire to move forward promptly with distribution of support via A-CAM, but expressed concern that this issue will deny some companies that would otherwise be eligible for and potential electors of the model the ability to do so. NTCA further appreciates that the A-CAM is structured and coded at a census block level such that it is not easy to make prompt changes to address this specific issue, but urged further creative consideration of some solution, such as the possibility of some kind of “manual override” in the calculation of model-based support, that could correct for this while still permitting consideration and resolution of model elections within the timelines initially contemplated.

Thank you for your attention to this correspondence. Pursuant to Section 1.1206 of the Federal Communications 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: Carol Matthey  
Alexander Minard  
Suzanne Yelen