



September 12, 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, September 8, 2016, and Friday, September 9, 2016, the undersigned on behalf of NTCA–The Rural Broadband Association (“NTCA”) held separate respective telephone conversations with Amy Bender, legal advisor to Commissioner Michael O’Rielly, and Stephanie Weiner, legal advisor to Chairman Tom Wheeler, to discuss matters in the above-referenced proceedings.

During these conversations, NTCA encouraged the Federal Communications Commission (the “Commission”) to pursue a clear implementation schedule that will enable all reforms (model and non-model) to take effect at approximately the same time to the extent possible. NTCA also urged swift and thorough publication of sufficient estimates, calculations, and other data in advance of any implementation deadlines to help inform upcoming universal service fund (“USF”) support elections.

In particular, NTCA noted the importance of providing data that will allow carriers to ascertain the potential impacts of a number of reforms still being implemented: (1) the new operating expense limits; (2) the competitive overlap rule; (3) any new buildout obligations; (4) the budget control as it might apply in 2017, and (5) the new capital investment allowance governing recovery of prospective investments via USF. We also discussed how greater transparency into such data is essential to enable all carriers – both those projected to be affected by any limits and even those who might not yet be affected by them – to operate efficiently and effectively consistent with Commission expectations. NTCA further stated that the prompt availability of all such information is important not only for evaluating USF support choices over the next 45 days, but also for purposes of time-sensitive capital budget planning for 2017 and the much-needed placement of orders for contractors, fiber, and other supplies necessary to achieve buildout objectives in 2017 and beyond.

Marlene H. Dortch
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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 –
Industry Affairs & Business Development

cc: Stephanie Weiner
Amy Bender