



September 28, 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; Implementation of Section 103 of the STELA Reauthorization Act of 2014, Totality of the Circumstances Test, MB Docket No. 15-216; Universal Service Contribution Methodology, WC Docket No. 06-122***

Dear Ms. Dortch:

On Monday, September 26, 2016, the members and staff of NTCA–The Rural Broadband Association (“NTCA”) listed on the attachment hereto met with Commissioner Michael O’Rielly and his legal advisor, Amy Bender, at NTCA’s Fall Conference. During that meeting, members discussed issues in the above-referenced proceedings.

First, NTCA members discussed the importance of sustainable robust networks capable of providing voice and broadband services in rural America. NTCA members described how their networks, many of which are supported by the high-cost universal service program, are essential not only for the purpose of fulfilling that program’s mission, but also to ensure the availability of fixed and mobile wireless services and to fulfill the separate but complementary universal service missions of the Schools and Libraries and Low-Income programs. In short, NTCA members highlighted how their networks and the high-cost program that helps to support them are prerequisites in rural areas for the achievement of other important public policy and consumer-oriented objectives of the Federal Communications Commission (the “Commission”).

We next discussed the process by which the Commission is implementing high-cost universal service reforms adopted earlier this year, and identified the need for accurate and timely data to enable meaningful evaluation of the choices for support before NTCA members of all kinds. NTCA members urged the Commission to ensure the transparency and accuracy of information used and made available as part of the implementation process. We also urged the Commission to ensure that the high-cost program budgets are sufficient to enable reasonable comparability of services and to implement the reforms in ways that do not deny carriers support needed to carry out the mission of universal service, regardless of whether they elect model-based NTCA members then raised concerns about programming and content costs in the video “marketplace.” NTCA

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noted how it is difficult even to discern whether and to what degree that “marketplace” is functioning given the lack of transparency and openness in it, and discussed how these costs undermine competition and broadband adoption.

Finally, we discussed generally reporting and regulatory burdens and encouraged continued review of ways to ensure a balance between the understandable need to collect data that inform the operation of Commission programs and the effects of such requirements on small businesses in particular.

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: Commissioner Michael O’Rielly  
Amy Bender

## **MEETING ATTENDEES**

Mark Bahnson-Bloomington Telephone Company  
Kevin Beyer-Farmers Mutual Telephone Company  
Don Bitz-Triangle Telephone Cooperative  
Doug Boone-Mutual Telephone Company dba Premier Communications  
Janet Britton- East Ascension dba EATEL  
James Dauby-PSC  
Bill Hegmann-NECA  
Ron Hinds-GRM Networks  
Allen Hoopes-Silver Star Communications  
Fred Johnson-Farmers Telecommunications  
John Klatt-Lakeland Communications Group, LLC  
Mitch Moore-Cleat Creek Communications  
Keith Oliver-Home Telephone Company, Inc. Moncks, SC  
Don Richards-Richards, Elders & Green, PLLC, Lubbock, TX  
Shirley Bloomfield-NTCA  
Jennifer Sullivan-NTCA  
Michael Romano-NTCA  
Jonah Arellano-NTCA