



October 4, 2017

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*

Dear Ms. Dortch:

On Tuesday, October 3, 2017, Shirley Bloomfield, Chief Executive Officer of NTCA–The Rural Broadband Association (“NTCA”), and the undersigned met with Commissioner Michael O’Rielly and Amy Bender, his wireline legal advisor.

NTCA highlighted the need to remedy the shortfalls in high-cost universal service fund (“USF”) support that are undermining the intended effectiveness of the USF programs as reformed last year. NTCA urged the Federal Communications Commission (the “Commission”) to initiate a comprehensive “budgetary review” for high-cost USF by year end as contemplated when the overall budget was first adopted in 2011, and pending such review, to continue as a near-term measure to collect the current overall budget for high-cost USF. To the extent that such collection yields contributed amounts in excess of then-current high cost USF demand for the constituent program components, NTCA further urged the Commission to use any such additional sums to mitigate the shortfalls in support that are being applied only to smaller rural carriers. As a complement to this approach, NTCA urged the Commission, at a minimum, to use any high-cost USF reserves that have not already been expressly allocated pursuant to Commission order to fill the budget shortfall, again pending completion of the review contemplated by the Commission’s defense of its budget before the Tenth Circuit.

Consistent with prior advocacy, NTCA also discussed action on outstanding “punchlist” items necessary to address issues arising out of USF reforms adopted by the Commission last year. *See, e.g., Ex Parte* Letter from Michael R. Romano, Sr. Vice President, NTCA, to Marlene H. Dortch, Secretary, Commission, WC Docket No. 10-90 (filed May 3, 2017).

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: Commissioner Michael O'Rielly
Amy Bender