



October 10, 2014

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; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition; Petition of NTCA for a Rulemaking to Promote and Sustain the Ongoing TDM-to-IP Evolution, GN Docket No. 12-353; Technology Transitions Policy Task Force, GN Docket No. 13-5; Protecting and Promoting the Open Internet, GN Docket No. 14-28*

Dear Ms. Dortch:

On Wednesday, October 8, 2014, Shirley Bloomfield and the undersigned, on behalf of NTCA—The Rural Broadband Association (“NTCA”), met with Jonathan Sallet, General Counsel of the Federal Communications Commission (the “Commission”), Diane Griffin Holland, Deputy Associate General Counsel, and Marcus Maher, Assistant General Counsel, to discuss matters in the above-referenced proceedings.

NTCA first described its position with respect to the Commission’s Open Internet proceeding, expressing support consistent with its prior comments for targeted and carefully tailored steps, based upon a solid legal foundation, to promote seamless interconnection across the “Service and Network Ecosystem” that composes the Internet. *See* Comments of NTCA, GN Docket No. 14-28 (filed July 18, 2014), at 2-17; Reply Comments of NTCA, GN Docket No. 14-28 (filed Sept. 15, 2014), at 3-16.

NTCA next discussed the need for the Commission to view the implementation of a Connect America Fund in areas served by rural, rate-of-return-regulated local exchange carriers as a cornerstone of broader “technology transitions” initiatives. NTCA noted that the record indicates broad support and no opposition for the updates proposed by rural telecom stakeholders. Moreover, certain narrow questions raised with respect to the proposals in initial comments (such as “budget” questions or the development of a voluntary alternative support distribution path for interested carriers) were specifically addressed in prior NTCA comments. *See, e.g.,* Comments of NTCA, *et al.*, WC Docket No. 10-90, *et al.* (filed August 8, 2014), at 6-28 and 65-68. NTCA therefore urged the Commission to move forward as soon as possible with a well-constructed and carefully managed transition away from legacy support mechanisms to a simple and straightforward new mechanism focused on supporting broadband-capable networks that will enable technology transitions and consumer choice in high-cost areas served by smaller carriers.

Marlene H. Dortch
October 10, 2014
Page 2 of 2

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 – Policy

cc: Jonathan Sallet
Diane Griffin Holland
Marcus Maher