



October 30, 2015

***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 Wednesday, October 28, 2015, the undersigned on behalf of NTCA–The Rural Broadband Association (“NTCA”), met with Carol Matthey, Deputy Chief of the Wireline Competition Bureau, to discuss matters in the above-referenced proceeding.

In addition to asking clarifying questions with respect to potential universal service fund (“USF”) reform options, NTCA discussed the recent letter it had filed jointly with several other rural telecom stakeholders setting forth proposals for revised “speed standards” and reporting requirements in the context of USF support. *Ex Parte* Letter from Michael R. Romano, Sr. Vice President-Policy, NTCA, to Marlene H. Dortch, Secretary, Federal Communications Commission (the “Commission”), WC Docket No. 10-90 (filed Oct. 26, 2015). In that letter, NTCA and its allies observed that, to achieve “reasonable comparability” between rural and urban consumers, the Commission should not and could not maintain a lower broadband speed objective for high-cost areas in the USF program while identifying more robust broadband speeds as a target objective pursuant to Section 706 of the Telecommunications Act of 1996 on a nationwide basis. Instead, NTCA noted that its letter suggested a path that would avoid imposing “unfunded mandates” while: (1) more closely tethering the targets or objectives of high-cost USF programs to Section 706 standards; (2) providing the Commission with much improved data on the extent to which RLECs are delivering such speeds to consumers in certain locations using USF resources; and (3) ensuring rural consumers do not suffer the loss of support and access to affordable broadband simply because another provider might be offering a broadband service that would actually be deemed insufficient in an urban area pursuant to Section 706. NTCA therefore urged the Commission to adopt the proposals set forth in the letter.

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: Carol Matthey