



November 3, 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; Protecting and Promoting the Open Internet, WC Docket No. 14-28***

Dear Ms. Dortch:

On Wednesday, November 2, 2016, the undersigned, on behalf of NTCA–The Rural Broadband Association (“NTCA”), met with Claude Aiken, legal advisor to Commissioner Mignon Clyburn, regarding matters in the above-referenced proceeding.

Specifically, consistent with prior advocacy, NTCA emphasized the need for prompt action with respect to the sorting of universal service fund (“USF”) model elections and resolution of any budget concerns that may arise should such elections result in anticipated “oversubscription” for the model. *See Ex Parte* Letter from Michael R. Romano, Senior Vice President, NTCA, to Marlene H. Dortch, Secretary, Federal Communications Commission (the “Commission”), WC Docket No. 10-90 (filed July 28, 2016); Petition for Reconsideration and/or Clarification of NTCA, WC Docket No. 10-90, *et al.* (filed May 25, 2016) (“NTCA Petition”), at 12-14. NTCA observed that failure to achieve quick and carefully calibrated resolution of any budget concerns that arise out of model oversubscription could have a significant punitive impact on non-model mechanisms – and, most importantly, upon the consumer rates for standalone broadband that are already highly likely to be negatively affected by insufficient support budgets – contrary to the stated goals of reform. *See* NTCA Petition, at 2-9; *see also Ex Parte* Letter from Michael R. Romano, Senior Vice President, NTCA, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 10-90 (filed May 12, 2016) (identifying several options for addressing budget implications of model elections). NTCA further noted that such concerns are particularly acute in the wake of significant USF 2017 “budget cuts” dropped upon the industry last week that will already adversely affect the ability of individual carriers to keep investing, to repay loans for investments already made, and to offer affordable, quality broadband services to consumers.

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As a separate matter, NTCA discussed a circulating item that would address the current exemption provided to smaller operators from certain “enhanced transparency” requirements adopted in the 2015 Open Internet Order. NTCA urged the Commission to continue to provide an extension for smaller companies from these requirements, and as it may seek comment on such matters going forward, to take stock in particular of the burdens as noted on the existing record with respect to aspects of those requirements.

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: Claude Aiken