



November 18, 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 Tuesday, November 17, 2015, the undersigned, on behalf of NTCA–The Rural Broadband Association (“NTCA”), together with Denny Law of Golden West Communications, Ryan Boone of Premier Communications, Rich Coit of the South Dakota Telecommunications Association, Randy Houdek of Venture Communications, and Larry Thompson of Vantage Point Solutions, met separately with: (1) Travis Litman, legal advisor to Commissioner Jessica Rosenworcel; (2) Robin Colwell and Amy Bender, chief of staff and legal advisor, respectively, to Commissioner Michael O’Rielly; and (3) Claude Aiken, Office of General Counsel, and Carol Matthey, Deputy Chief of the Wireline Competition Bureau.

The discussion focused on questions previously raised by the NTCA and other associations regarding potential universal service fund reforms, the potential effects of such reforms on certain carriers, and whether certain reforms will actually be effective in achieving specific objectives identified by the Commission. *See Ex Parte* Letter from B. Lynn Follansbee, USTelecom, to Marlene H. Dortch, Federal Communications Commission (the “Commission”), WC Docket No. 10-90 (dated Oct. 2, 2015); *Ex Parte* Letter from Regina McNeil, National Exchange Carrier Association, to Marlene H. Dortch and Lynne Hewitt Engledow, Commission, WC Docket No. 10-90 (dated Nov. 13, 2015). In particular, we raised questions about whether stakeholders currently have sufficient information and adequate notice to understand the precise scope and potential impacts of various reform alternatives – especially as assumptions continue to evolve and be modified in various data analyses – and we noted process options that could be used to ensure that such understanding can be obtained and the record developed to justify any action on specific aspects of reform. *See Ex Parte* Letter from Michael R. Romano, NTCA, to Marlene H. Dortch, Commission, WC Docket No. 10-90 (dated Nov. 9, 2015). We noted, for example, that in the absence of any clearly defined proposals with respect to the contours of “the bifurcated approach” and the prospect of uncertainty as substantial new reforms might be adopted that could reshuffle distributions in unintended ways, such factors could undermine the goals of such reforms and frustrate informed decision-making by carriers with respect to model election options that may be made available. As another example, we discussed how and whether average schedule companies would be able to make informed choices among distribution options given the need for follow-on work with respect to average schedule formulas.

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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 – Policy

cc: Travis Litman  
Robin Colwell  
Amy Bender  
Claude Aiken  
Carol Matthey