



November 24, 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; ETC Annual Reports and Certification, WC Docket No. 14-58; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; Developing an Unified Intercarrier Compensation Regime, CC Docket No. 01-92; Special Access for Price Cap Local Exchange Carriers, WC Docket No. 05-25; Amendment of the Commission’s Rules Related to Retransmission Consent, MB Docket No. 10-71; Universal Service Contribution Methodology, WC Docket No. 06-122*

Dear Ms. Dortch:

On Thursday, November 20, 2014, staff and members of NTCA–The Rural Broadband Association (“NTCA”) as listed on the attachment hereto met with Commissioner Ajit Pai and his wireline legal advisor, Nicholas Degani. During that conversation, certain NTCA members raised matters relating to the above-referenced proceedings.

NTCA members discussed first the need for updates to universal service mechanisms so that consumers in high-cost areas served by rural rate-of-return-regulated local exchange carriers can obtain affordable access to sustainable broadband. NTCA members expressed appreciation for Commissioner Pai’s continuing leadership on and interest in resolution of this issue, and urged the Federal Communications Commission (the “Commission”) to move forward as promptly as possible to adopt simple and straightforward new universal service rules that: (1) avoid introducing additional complexity as a result of reforms; (2) minimize the potential for disruption or uncertainty during any transition to new support mechanisms; and (3) ensure the sustainability and effectiveness of the program. NTCA members also raised concerns about how universal service can be sustained in the face of an eroding contribution base, paired with a decline or even withholding of direct payments by those who make the most substantial use of the networks that keep American consumers, businesses, schools, libraries, and hospitals connected. NTCA members further expressed concerns about the effects of certain caps on support over time, especially in highly rural and tribal areas where broadband deployment is difficult, if not impossible, at any point in the foreseeable future due to the impacts of such caps.

Marlene H. Dortch
November 24, 2014
Page 2 of 2

NTCA members then voiced concerns about the onerous nature of the many reporting requirements imposed by the Commission, highlighting in particular the addition in recent years of five-year plans, changes to Form 477 reporting, and special access data collections that have imposed massive obligations on small businesses with limited staff and resources. NTCA members urged the Commission to consider more carefully the degree to which the information in such reports is in fact necessary and used to achieve any regulatory objective, and to cease relying so heavily on “averages” in burden estimates when smaller carriers lack the kinds of staff and systems that enable larger providers to respond to such requirements much more quickly and easily.

NTCA members finally raised concerns about the ever-increasing costs of video programming, and what these costs mean for consumers in terms of both access to content and broadband adoption. NTCA continues to urge the Commission to take action consistent with the association’s prior filings to remedy a broken video marketplace that is propped up by outdated rules that operate to the clear and unequivocal detriment of consumers. *See* Comments of NTCA, MB Docket No. 10-71 (filed June 26, 2014).

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: Commissioner Ajit Pai
Nicholas Degani

ATTENDEES
NOVEMBER 20, 2014
NTCA MEETING WITH COMMISSIONER AJIT PAI AND NICHOLAS DEGANI

Ron Hinds
GRM Networks

John Klatt
Lakeland Communications Group, LLC

Kevin Beyer
Federated Telephone Cooperative

Mark Bahnson
Bloomington Telephone Company, Inc.

Allen R. Hoopes
Silver Star Communications

H. Keith Oliver
Home Telephone Company, Inc

Janet Britton
EATEL

William P. Hegmann
Southwest Arkansas Telephone Cooperative,
Inc.

Terry Force
Blue Valley Tele-Communications, Inc.

Donald D. Miller
Northwest Telephone Cooperative Association

James J. Kail
Laurel Highland Telephone Co.

Allen Russ
ATMC

Larry Windham
Progressive Rural Telephone Coop.

J. Frederick Johnson
Farmers Telecommunications Coop.

James M. Dauby
PSC

Douglas Boone
Premier Communications

Robert DeBroux
TDS Telecom

Paul Schuetzler
Consolidated Telcom

Loren Duerksen
Diller Tel. Co.

Tom Young
Kingdom Telephone Co.

Mitchell A. Moore
Clear Creek Communications

Godfrey Enjady
Mescalero Apache Telecom

Don Richards
Richards, Elder & Green, LLP

Shirley Bloomfield
CEO, NTCA–The Rural Broadband
Association

Mike Romano
Senior Vice President of Policy
NTCA–The Rural Broadband Association

Jennifer Sullivan
Executive Assistant to the CEO
NTCA–The Rural Broadband Association