



December 4, 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, December 2, 2015, the undersigned on behalf of NTCA–The Rural Broadband Association (“NTCA”), spoke via telephone with Carol Matthey, Deputy Chief of the Wireline Competition Bureau, to discuss matters in the above-referenced proceeding.

During the conversation, we discussed processes and standards that should be used to verify the presence and capabilities of would-be “unsubsidized competitors” in rural rate-of-return-regulated local exchange carrier (“RLEC”) study areas or portions thereof. *See, e.g., Ex Parte* Letters from Michael R. Romano, Senior Vice President, NTCA, to Marlene H. Dortch, Secretary, Federal Communications Commission (the “Commission”), WC Docket No. 10-90 (filed Oct. 29, 2015 and July 16, 2015); Comments of NTCA, *et al.*, WC Docket No. 10-90, *et al.* (filed Aug. 8, 2014), at 34-60.

We also discussed possible means of ensuring more sufficient support could be made available to address concerns about reasonable comparability in the delivery of voice and broadband services to consumers by RLECs under a “bifurcated approach” to reform and to minimize potential adverse impacts of such a reform on certain types of RLECs (including, but not limited to average schedule firms and other relatively lower-cost operators). *See, e.g., Ex Parte* Letters from Regina McNeil, General Counsel, NECA, to Marlene H. Dortch, Secretary, Commission, WC Docket No. 10-90 (filed Nov. 6, Nov. 17, and Nov. 19, 2015) (identifying potential impacts of certain reforms and “budget controls” on carrier support and consumer rates). For example, NTCA noted that any “budget savings” generated by transitions for those RLECs electing to receive lesser amounts in model-based support could be used to help with other transitions and lessen the potential adverse impacts of reforms on RLECs and their consumers continuing to receive cost-based support under the “bifurcated approach.”

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Finally, we discussed the need to achieve a balance between building and sustaining broadband-capable networks, including: (a) the need to ensure that any additional resources made available to stimulate the construction of networks via a model are used efficiently to direct support where needed most; and (b) ways to more directly encourage deployment in unserved areas via cost-based support as well going forward.

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