



December 20, 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*

Dear Ms. Dortch:

On Monday, December 19, 2016, the undersigned, on behalf of NTCA–The Rural Broadband Association (“NTCA”), met in person with Claude Aiken, legal advisor to Commissioner Mignon Clyburn, and Travis Litman, legal advisor to Commissioner Jessica Rosenworcel, and held separate telephone conversations with Amy Bender, legal advisor to Commissioner Michael O’Rielly; Nicholas Degani, legal advisor to Commissioner Ajit Pai; and Carol Matthey, Deputy Chief of the Wireline Competition Bureau, to discuss matters in the above-referenced proceeding.

Consistent with prior advocacy, NTCA urged the Federal Communications Commission (the “Commission”) to ensure that its high-cost universal service fund (“USF”) reforms adopted earlier this year will function as intended and achieve the statutory mandates of universal service by providing sufficient support. *Ex Parte* Letter from Michael R. Romano, Senior Vice President, NTCA, to Marlene H. Dortch, Secretary, Commission, WC Docket No. 10-90 (filed Nov. 14, 2016); Petition for Reconsideration and/or Clarification of NTCA, WC Docket No. 10-90, *et al.* (filed May 25, 2016), at 2-9 and 12-14. Specifically, in addition to the much-needed use of high-cost USF funds on hand to mitigate shortfalls with respect to model oversubscription, NTCA continues to assert that additional funds on hand should be used as well to close immediate funding shortfalls in the nonmodel mechanisms that will lead to continuing unaffordable standalone broadband rates for rural consumers, undermining if not eviscerating the purpose of the recent reforms.

Moreover, if the Commission does not address such funding matters fully in the near-term, NTCA urged the Commission to recognize explicitly as part of any upcoming order and further notice the co-equal importance of sufficiency of USF support *for both the model and non-model USF mechanisms*. The plain facts already on the record are that both mechanisms are essential in enabling consumer and business use of broadband at affordable rates in rural America, and that each is destined to fall short in achieving that mission in the absence of sufficient support. NTCA further states that, if implementation of both mechanisms were to move forward in the near-term without sufficient funding of the reforms as adopted, the Commission should ensure that any resolution of the model elections will not have a negative effect on those companies that did not elect model support (including, to the extent necessary, using additional high-cost USF funds on hand to ensure that any rejection of even *revised* model offers that result in lower support will have no impact whatsoever on those companies that are not participating in the model elections).

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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 –
Industry Affairs & Business Development

cc: Claude Aiken
Amy Bender
Nicholas Degani
Travis Litman
Carol Matthey