



Advocates for Rural Broadband

Mark M. Gailey
President

Kelly Worthington
Executive Vice President

December 20, 2013

Filed Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**RE: WC Docket Nos. 10-90, 07-135, 05-337 and 03-109; CC Docket No. 01-92 and 96-45;
GN Docket No. 09-51; and WT Docket No. 10-208**

Dear Ms Dortch:

On Wednesday, December 18, 2013, Mark Gailey of Totah Communications, Inc.; Bob DeBroux of TDS Telecommunications Corp.; Derrick Owens and Gerry Duffy representing WTA met with Commissioner Michael O'Rielly and Amy Bender to introduce WTA and to speak generally about some of the issues and proceedings in which WTA and its members are interested.

WTA is a national trade association that represents more than 250 rural telephone and broadband service providers. The typical WTA member serves approximately 3,000 access lines, and has a staff of 7-to-15 full-time employees. Mr. Gailey is the current President of WTA and Mr. DeBroux is the Co-Chairperson of its Public Policy Committee.

WTA noted that its members have made substantial strides in deploying broadband facilities and services, and that they desire to continue investing in the broadband infrastructure necessary to extend broadband further and further into their rural service areas and to offer the faster and faster broadband speeds necessary to support the advanced services needed by their rural customers. WTA has been active in the TDM-to-IP transition proceedings, both filing comments and meeting with the Commission staff. It recognizes that its members are far down the path of evolution from voice service providers to broadband service providers, and is eager to participate and contribute in the future Commission proceedings that will address consumer impacts, technical issues, interconnection and middle mile arrangements, and other legal, technical and economic matters related to the IP transition.

WTA reiterated the high costs of serving rural areas, and the reliance of its members upon universal service support during the foreseeable future. WTA supports Chairman Wheeler's announced plans to end the quantile regression analysis ("QRA") benchmarks that have been a major impediment to rural broadband investment and financing, and noted that WTA and the other rural telecommunications associations have proposed a capital budget mechanism that can much more specifically and predictably address the investment concerns for which the QRA was devised. WTA also observed that the rural telecommunications associations have also proposed a data-only broadband support mechanism designed to encourage additional broadband deployment and adoption in rural areas.

WTA also briefly discussed the impact of stimulus grants in permitting some broadband extensions, the significant changes in dollar flows in the IP world as WTA members and other small carriers lose access revenues and are required to pay increased middle mile transport charges, and the efforts and difficulties of WTA members to develop new revenue streams.

Pursuant to Section 1.1206(b) of the Commission's Rules, this submission is being filed for inclusion in the public record of the referenced proceedings.

Respectfully submitted,

/s/ Gerard J. Duffy

Gerard J. Duffy
WTA Regulatory Counsel

Blooston, Mordkofsky, Dickens, Duffy & Prendergast, LLP
2120 L Street NW (Suite 300)
Washington, DC 20037
Telephone: (202) 659-0830
Email: gjd@bloostonlaw.com

cc: Commissioner Michael O'Rielly
Amy Bender