



July 9, 2014

***Ex Parte Notice***

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re: *Connect America Fund, WC Docket No. 10-90; Universal Service Reform – Mobility Fund, WT Docket No. 10-208; 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***

Dear Ms. Dortch:

On Tuesday, July 8, 2014, the undersigned, on behalf of NTCA–The Rural Broadband Association (“NTCA”), together with Joshua Seidemann of NTCA, Gerry Duffy and Derrick Owens of WTA-Advocates for Rural Broadband, David Cohen of USTelecom, Jeff Dupree of the National Exchange Carrier Association, Mark Gailey of Totah Communications, Robert DeBroux of TDS Telecom, Jeff Smith of GVNW, and Paul Cooper of Fred Williamson & Associates met with Carol Matthey, Ted Burmeister, Christopher Cook, Katie King, Heidi Lankau, Alexander Minard, Vickie Robinson, Gary Seigel, Joe Sorresso, Mark Walker, and Suzanne Yelen of the Wireline Competition Bureau to discuss matters in the above-referenced proceedings. Messrs. Burmeister, DeBroux, Gailey, Owens, Seidemann, and Smith participated in the meeting via conference bridge.

The meeting participants discussed possible updates to the existing high-cost rules for areas served by rural, rate-of-return-regulated local exchange carriers. We expressed support for adoption as soon as possible of a thoughtful and carefully constructed transition away from legacy support mechanisms to a new mechanism focused on supporting broadband-capable networks. We also raised questions about certain issues flagged in the recent Further Notice of Proposed Rulemaking released on June 10, 2014 by the Federal Communications Commission (the “Commission”) in the above-referenced proceedings, including how the Commission might identify purported competitors in given areas, the allocation of costs and revenues under varying proposals and principles set forth in the Further Notice, and the development of administratively simple benchmarks to identify what costs might be eligible for high-cost universal service fund support to the extent that costs are allocated in varying ways suggested by the Further Notice. We further discussed aspects of the methodology used to calculate the rate floor applicable to local exchange voice services.

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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: Carol Matthey  
Ted Burmeister  
Christopher Cook  
Katie King  
Heidi Lankau  
Alexander Minard  
Vickie Robinson  
Gary Seigel  
Joe Sorresso  
Mark Walker  
Suzanne Yelen