



Advocates for Rural Broadband

Mark M. Gailey  
President

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April 29, 2015

**Filed Via ECFS**

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

**RE: WC Docket Nos. 10-90, 07-135, and 06-122; WT Docket No. 10-208;  
and CC Docket Nos. 96-45 and 01-92**

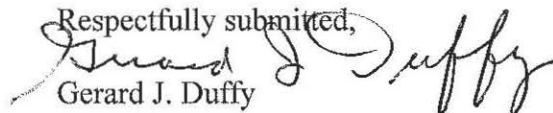
Dear Ms. Dortch:

On Monday, April 27, 2015, Derrick Owens and Gerry Duffy representing WTA – Advocates for Rural Broadband (“WTA”) met with Carol Matthey, Alexander Minard and Suzanne Yelen of the Wireline Competition Bureau to discuss various matters regarding the Data Connection Service (“DCS”) plan proposed by the Rural Associations and related Universal Service reform matters.

The discussion included reiteration of the need for universal service support for broadband-only lines to avoid significant customer rate increases, and potential ways in which limitations on capital and operating expenses can satisfy the Commission’s principles and goals regarding the use of “forward-looking costs” in its universal service mechanisms. Voluntary cost-based models were also discussed, including the number and timing of potential opt-in periods, potential limitations on the size of support increases or reductions affecting carriers electing to use a model, and potential service conditions accompanying model-based support. Finally, options for staying within the Commission’s high-cost support budget and for identifying service areas containing unsubsidized competitors were discussed.

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,

  
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