



Advocates for Rural Broadband

Paul Kelly
President

Kelly Worthington
Executive Vice President

November 10, 2015

Filed Via ECFS

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

RE: *Connect America Fund*, WC Docket No. 10-90

Dear Ms. Dortch:

On Thursday, November 5, 2015, Evelyn Jerden of LICT Corporation; Bob DeBroux of TDS Telecom; Mark Gailey of Totah Communications; and Derrick Owens and Gerry Duffy representing WTA – Advocates for Rural Broadband (“WTA”) met via telephone with Carol Matthey, Suzanne Yelen and Alex Minard of the Wireline Competition Bureau to discuss potential changes to high-cost support mechanisms for rural carriers.

The topics discussed included the structure of bifurcated support mechanisms for “old” and “new” investment and operating expenses; transition periods and terms for bifurcated mechanisms; nature and calculation of potential benchmarks; identification, impacts and challenge processes regarding unsubsidized competitors; effects of model-based support on subscriber line charges, special access services and pooling; build-out requirements; allocation of CAF Reserve if a significant number of study areas initially opts into model-based support; status and impact of Alaska and Tribal plans; and treatment of acquisitions and mergers that take place after initial elections of alternative support paths.

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 proceeding.

Respectfully submitted,

/s/ Gerard J. Duffy

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