



Advocates for Rural Broadband

Paul Kelly
President

Kelly Worthington
Executive Vice President

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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 Tuesday, December 1, 2015, Evelyn Jerden of LICT Corporation; Mark Gailey of Totah Communications; and Derrick Owens and Gerry Duffy representing WTA – Advocates for Rural Broadband (“WTA”) met via telephone with Deena Shetler, Pamela Arluk, Victoria Goldberg, Katie King, Doug Sloten, Joseph Sorresso and Suzanne Yelen of the Wireline Competition Bureau to discuss the tariff and pricing impacts of potential changes to high-cost support mechanisms for rural carriers.

The topics discussed included the potential impact of the voluntary election of the optional Model-based path by rural local exchange carriers (“RLECs”) upon subscriber line charges (“SLCs”), special access rates and revenues, and participation in National Exchange Carrier Association (“NECA”) pools.

For RLECs that choose the Alternative Connect America Cost Model (“A-CAM”) as the basis for their high-cost support, SLC questions include: (a) whether SLCs and SLC revenue streams will continue to be available to the electing RLECs; (b) how SLCs will be calculated when A-CAM support replaces Interstate Common Line Support (“ICLS”); and (c) whether SLCs will continue to be allowed to be calculated, tariffed and pooled through NECA, or whether they will be required to be calculated and tariffed separately by individual RLECs. Special access questions include: (a) whether A-CAM participants will be permitted to remain on rate-of-return regulation for special access; (b) how digital subscriber line (“DSL”) and business special access services of A-CAM participants will be distinguished and treated for special access pricing purposes; and (c) how the special access revenue requirements of A-CAM participants will be calculated and the relevant special access rates determined and tariffed. Both SLC and special access questions also include issues regarding the continued availability of NECA pooling for common line, switched and special access revenues of A-CAM participants.

WTA supports: (1) the continued ability of A-CAM participants to charge SLCs and to rely upon important SLC revenue streams; (2) the option of A-CAM participants to elect to remain on rate-of-return regulation for special access services; or to convert to price caps for special access if they so choose; and (3) the continued ability of A-CAM participants to elect to participate in NECA pools for common line and switched access services and/or special access services.

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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