



**Advocates for Rural Broadband**

Paul Kelly  
President

Kelly Worthington  
Executive Vice President

February 1, 2016

**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, January 28, 2016, Evelyn Jerden of LICT Corporation, and Derrick Owens and Gerry Duffy representing WTA – Advocates for Rural Broadband (“WTA”) met via telephone with Carol Matthey and Suzanne Yelen of the Wireline Competition Bureau to discuss universal service reform for rate-of-return carriers.

The discussion encompassed both the potential Model-based support path and the potential Rate of Return path, and focused particularly upon the types of build-out requirements that may be applicable to each path. There was also discussion of options for capital budget mechanisms, operating expense limitations and benchmarks that may be relevant to the potential Rate of Return path. WTA reiterated its interest in working with the Commission and its staff to finalize and implement universal service reforms that enable its members to continue to provide their rural customers with quality, affordable and reasonably comparable voice and broadband 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

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](mailto:gjd@bloostonlaw.com)

cc: Carol Matthey  
Suzanne Yelen

