



Advocates for Rural Broadband

Paul Kelly  
President

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October 24, 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:

This letter is written to follow up a meeting on September 20, 2016, between Evelyn Jerden of LICT Corporation; Bob DeBroux of TDS Telecom; Mark Gailey of Totah Communications; Eric Schmidt of Home Telephone Co. (Illinois); and Derrick Owens and Gerry Duffy representing WTA – Advocates for Rural Broadband (“WTA”) with Stephanie Weiner, Senior Legal Advisor to Chairman Tom Wheeler, and with Carol Matthey, Alexander Minard and Suzanne Yelen of the Wireline Competition Bureau to discuss WTA’s pending petition for reconsideration of the March 30, 2016 *USF Order*.

The particular focus of the meeting was WTA’s August 3, 2016 proposal in this docket regarding the evidentiary burden that should be required from an entity before it is deemed to have filed a *bona fide* claim in the Rate of Return Path challenge process for classification as an “unsubsidized competitor” in each of one or more specified Census Blocks. After the meeting, WTA has worked to develop a proposed form for use by the Commission and its Wireline Competition Bureau to enable an entity to submit the information necessary to satisfy its evidentiary burden regarding its claimed unsubsidized competitor status, and to permit the Commission and interested parties to analyze and test the accuracy of such claims.

Attached hereto is a copy of WTA’s proposed form and instructions. WTA will be happy to answer any questions regarding these materials.

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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Attachment

cc: Stephanie Weiner  
Carol Matthey  
Alexander Minard  
Suzanne Yelen