

February 9, 2017

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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, February 7, 2017, Jerry Piper of Cambridge Telephone Company (Idaho); Kip Wilson of Direct Communications (Idaho, Utah, Washington, Oregon, Missouri and Colorado); John Stuart of MTE Communications (Idaho and Arizona); and Derrick Owens, Eric Keber, Patricia Cave and Gerry Duffy representing WTA – Advocates for Rural Broadband (“WTA”) met with Jay Schwarz, Acting Wireline Advisor to Chairman Ajit Pai, to discuss various general rural telecommunication industry and universal service issues.

WTA began the meeting by describing its history, its current membership, and the universal service and other telecommunications issues in which its members are interested.

WTA and all three of its members represented at the meeting indicated their support for full funding of both the Alternative Connect America Cost Model (“ACAM”) Path and the Rate of Return (“RoR”) Path. Cambridge Telephone Company has elected the ACAM Path; Direct Communications has elected the ACAM Path in Missouri and Colorado, but was either ineligible for the ACAM Path or elected to remain on the RoR Path in the other four states; and MTE Communications remained on the RoR Path because it was not eligible to elect ACAM in either of its states.

All three WTA members emphasized the importance of viewing broadband deployment in terms of the construction of a comprehensive network infrastructure rather than focusing upon locations or speeds. They indicated from their direct experience that fiber optic networks are much more cost-effective in the long run: (1) because it is much less expensive to deploy broadband via a single fiber-optic build throughout an exchange or other area, rather than bringing construction crews and equipment back to a rural area multiple times to upgrade hybrid fiber-copper facilities in stages; (2) because fiber is scalable such that once fiber loops have been extended to the home or curb, it is relatively easy and inexpensive to increase broadband speeds by replacing (via cards) the electronics at their end points; and (3) because fiber is much easier and less costly to maintain since fiber loops have only two points of failure (both of which can be monitored and tested from the central office) compared to approximately eleven points of failure for digital subscriber line (“DSL”) facilities. The WTA members also noted that broadband deployment can be accomplished much more efficiently and economically if the Forest Service and federal, state and local highway departments would streamline their permit procedures, particularly by reducing or eliminating environmental studies for roadside easements that duplicate work that was done when the roads themselves were built.

WTA indicated its interest in working with the Commission to find ways to accomplish full and sufficient funding of both the ACAM Path and the RoR Path, including ways that the attainment of a fiber-based public broadband network can help achieve cost savings for the E-Rate, Rural Health Care and Lifeline programs.

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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