

February 16, 2017

**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, February 14, 2017, Mike George and Erin Jarrell of Northeast Louisiana Telephone Company (“NE Louisiana”); Kristi Lee of Valley TeleCom Group (“Valley”); Bob DeBroux of TDS Telecom (“TDS”); and Derrick Owens, Eric Keber, Patricia Cave and Gerry Duffy representing WTA – Advocates for Rural Broadband (“WTA”) met with Acting Bureau Chief Kris Monteith and with Lisa Hone, Ryan Palmer and Dana Zelman of the Wireline Competition Bureau, to discuss various general rural telecommunication industry and universal service issues.

WTA began the meeting by describing its history as first a western, and now a national, trade association of rural telecommunications companies; its current membership of small telecommunications companies (typically, from 2,000 to 3,000 access lines) that are rapidly becoming broadband service providers; and the universal service, video, cybersecurity and other issues in which its members are interested.

NE Louisiana indicated that it serves approximately 600 access lines in Morehouse Parish in a very rural portion of northeastern Louisiana. Its service area is comprised predominately of elderly, low-income households, and has no schools or hospitals and only two part-time libraries. NE Louisiana remains on the Rate of Return (“RoR”) Path since it was not eligible to elect the Alternative Connect America Cost Model (“ACAM”) Path because it had deployed fiber to the home (“FTTH”) throughout its service area in connection with a grant-loan from the 2009 American Recovery and Reinvestment Act’s Broadband Initiatives Program (“BIP”). However, two-thirds of its BIP grant-loan was a Rural Utilities Service (“RUS”) loan, and NE Louisiana remains very concerned about its ability to repay that loan.

Valley is a rural cooperative that serves approximately 5,500 access lines in a 10,000 square mile area of southeastern Arizona and southwestern New Mexico along the United States – Mexico border. Valley has remained on the RoR Path, but is uncertain regarding the amounts and sufficiency of its Universal Service Fund (“USF”) support going forward.

TDS, WTA’s largest member, serves over a half million rural access lines in 25 states. It elected the ACAM Path in all of its states.

WTA reiterated its support for full funding for both the ACAM Path and the RoR Path. It noted that it had filed comments to that effect in this docket on February 13, 2017.

WTA is very interested in the Commission's new Broadband Development Advisory Committee, and has several members willing to serve on the Committee and/or its working groups.

Finally, WTA noted that it had prepared and filed a suggested Unsubsidized Competitor Form in this docket during October 2016 as a follow-up to discussions with the Bureau regarding the future challenge process for entities claiming to be unsubsidized competitors within Census Blocks served by RoR Path carriers. WTA is attaching copies of the ex parte letter that it filed regarding this matter on October 24, 2016, plus copies of its suggested form and instructions.

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)

Attachments: WTA *Ex Parte* Letter in WC Docket No. 10-90, dated October 24, 2016  
WTA Unsubsidized Competitor Form and Instructions

cc: Kris Monteith  
Lisa Hone  
Ryan Palmer  
Dana Zelman