

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; Protecting the Privacy of Customers of Broadband and Other Telecommunications Services, WC Docket No. 16-106

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 Amy Bender, Legal Advisor, Wireline, to Commissioner Michael O’Rielly, to discuss various general rural telecommunication industry and universal service issues.

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. A fully funded ACAM (at the original \$200 per location funding benchmark) constitutes a valuable opportunity to deploy a lot more fiber in rural local exchange carrier (“RLEC”) networks, and to extend 25/3 Mbps and 10/1 Mbps broadband services to tens of thousands of new locations in many of the more expensive-to-serve, outlying portions of RLEC service areas. Full funding of the RoR Path – which means eliminating the unpredictable and investment-detering Section 54.904(f) budget control mechanism and adopting an inflation adjustment for the High Cost Program budget like those in other USF programs -- would

address inequities that precluded significant numbers of RLECs from electing the ACAM Path as well as provide reasonably comparable broadband services for the customers of the more than half of RLECs that remain on the RoR Path.

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.

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.

Finally, WTA urged the Commission to act expeditiously in considering the stay petition filed by WTA and other industry associations regarding the Broadband Privacy Order.¹

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

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

cc: Amy Bender

¹ See Joint Petition for Stay, WC Docket No. 16-106 (filed Jan. 27, 2017).