July 9, 2014

Ex Parte Notice

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Connect America Fund, WC Docket No. 10-90; Universal Service Reform – Mobility Fund, WT Docket No. 10-208; ETC Annual Reports and Certification, WC Docket No. 14-58; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; Developing an Unified Intercarrier Compensation Regime, CC Docket No. 01-92

Dear Ms. Dortch:


The meeting participants discussed possible updates to the existing high-cost rules for areas served by rural, rate-of-return-regulated local exchange carriers. We expressed support for adoption as soon as possible of a thoughtful and carefully constructed transition away from legacy support mechanisms to a new mechanism focused on supporting broadband-capable networks. We also raised questions about certain issues flagged in the recent Further Notice of Proposed Rulemaking released on June 10, 2014 by the Federal Communications Commission (the “Commission”) in the above-referenced proceedings, including how the Commission might identify purported competitors in given areas, the allocation of costs and revenues under varying proposals and principles set forth in the Further Notice, and the development of administratively simple benchmarks to identify what costs might be eligible for high-cost universal service fund support to the extent that costs are allocated in varying ways suggested by the Further Notice. We further discussed aspects of the methodology used to calculate the rate floor applicable to local exchange voice services.
Thank you for your attention to this correspondence. Pursuant to Section 1.1206 of the Commission’s rules, a copy of this letter is being filed via ECFS.

Sincerely,

/s/ Michael R. Romano
Michael R. Romano
Senior Vice President – Policy

cc: Carol Mattey
    Ted Burmeister
    Christopher Cook
    Katie King
    Heidi Lankau
    Alexander Minard
    Vickie Robinson
    Gary Seigel
    Joe Sorresso
    Mark Walker
    Suzanne Yelen