

May 8, 2015

Filed Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**RE: WC Docket Nos. 10-90, 14-58, 07-135, and 06-122; WT Docket No. 10-208;
and CC Docket Nos. 96-45 and 01-92**

Dear Ms. Dortch:

On Tuesday, May 5, 2015, Christine O'Connor of the Alaska Telephone Association (ATA); Genny Morelli of the Independent Telephone & Telecommunications Alliance (ITTA); Lynn Follansbee of the United States Telecom Association (USTelecom); Jim Frame and Jeff Dupree of the National Exchange Carrier Association, Inc. (NECA); Cheryl Parrino of Parrino Strategic Consulting Group (PSCG); Douglas Meredith of John Staurulakis, Inc. (JSI); Mark Gailey of Totah Communications, Inc.; Evelyn Jerden of LICT Corporation; Bob DeBroux of TDS Telecom; Ryan Boone of Premier Communications; Trey Judy of Hargray Communications; and Derrick Owens and Gerry Duffy representing WTA – Advocates for Rural Broadband (WTA) met with Commissioner Michael O'Rielly and Amy Bender, his Legal Adviser – Wireline, in Indian Wells, California, to discuss the ongoing negotiations by a variety of rural telephone industry stakeholders looking toward the development of a comprehensive plan for future voluntary model-based support and rate-of-return support.

The rural representatives indicated they had already met several times, and had scheduled additional meetings. They were currently working on several tracks, including the use of the Commission's Alternate Connect America Cost Model (A-CAM) as the focus of a model-based track, and the Data Connection Service (DCS) proposal advanced by several rural telephone company (RLEC) associations as the focus of a rate-of-return track. To date, the major issues have entailed compliance with the Commission's overall budget goal, and the development of appropriate transition mechanisms. Other significant questions involved the build-out and other performance obligations that may be imposed upon carriers that elect model-based support; the number and timing of the periods during which carriers will be permitted to voluntarily opt into model-based support; and how the presence of unsubsidized competitors will be determined for A-CAM purposes.

There was significant discussion regarding the number of RLECs likely to opt into model-based support. The opinion of several rural representatives was that accurate prediction was unlikely until the A-CAM model revisions were completed, actual model-based support offers published, and associated performance obligations specified.

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 proceedings.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gerard J. Duffy". The signature is fluid and cursive, with the first name "Gerard" being the most prominent.

Gerard J. Duffy
WTA Regulatory Counsel

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cc: Commissioner Michael O'Rielly
Amy Bender