



Advocates for Rural Broadband

Paul Kelly
President

Kelly Worthington
Executive Vice President

March 31, 2016

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, March 29, 2016, Derrick Owens and Gerry Duffy representing WTA – Advocates for Rural Broadband (“WTA”) met with Diane Cornell, Special Counsel to Chairman Tom Wheeler, to discuss reform and reduction of reporting requirements for rural local exchange carriers (“RLECs”).

WTA advocates the reduction of the reporting requirements and associated regulatory costs of RLECs so that they can devote more of their resources to meeting the broadband needs of their rural customers at a time when the high-cost support of many RLECs is not increasing significantly (and may be decreasing). WTA desires to work with the Commission and its Wireline Competition Bureau on reporting reforms that can reduce corporate operations expenses and other regulatory costs while still providing the information that the Commission needs and uses. In addition to reducing or eliminating certain forms and reports, such reforms might include: (a) modification and/or sharing of existing Commission forms and reports so that they can reduce or eliminate duplicative state commission filings; and (b) consolidation of various annual certifications due at different times of the year into a single form and/or filing deadline.

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
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