



Advocates for Rural Broadband

Jerry Piper  
President

Kelly Worthington  
Executive Vice President

November 1, 2018

**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, October 30, 2018, Derrick Owens and Gerry Duffy representing WTA – Advocates for Rural Broadband (“WTA”) met with Alex Minard, Suzanne Yelen, Jesse Jackman and Ted Burmeister (via telephone) to discuss a number of issues regarding the High Cost Fund and budget.

During the meeting, WTA discussed a range of potential regulatory solutions for addressing rural broadband deployment and the sufficient and predictable high-cost support needed to achieve it. These matters included: (a) sufficient funding of existing Alternative Connect America Cost Model (“ACAM”) and cost-based Rate-of-Return (“RoR”) support mechanisms; (b) the implementation and technical and economic feasibility of potential changes to associated broadband build-out obligations; (c) the potential impact of the growth of Customer Broadband Only Line (“CBOL”) services upon cost-based RoR budgets and budget control mechanisms; (d) the nature and structure of mechanisms to address unsubsidized competitor issues; and (e) the design and eligibility standards for a potential second ACAM offer. WTA indicated that the main priority at this time should be to fully fund existing ACAM and cost-based RoR mechanisms before contemplating a second ACAM offer that would appear likely to place additional demands upon limited Universal Service Fund resources.

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

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