



December 6, 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, December 4, 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) of the Wireline Competition Bureau to discuss the Commission’s Report and Order, Further Notice of Proposed Rulemaking and Order on Reconsideration on circulation in the referenced proceeding (FCC-CIRC1812-02).

WTA emphasized its support for the Report and Order as circulated. It particularly applauds the Commission’s focus upon 25/3 broadband service, and its efforts to provide increased high cost support to help all Rate-of-Return (“RoR”) carriers to upgrade and extend reasonably comparable broadband networks and services to the rural households and businesses they serve.

WTA supports the proposed offer to allow those RoR carriers that previously elected to receive Alternative Connect America Cost Model (“ACAM”) support to elect, on a voluntary basis, an increase in model-based support from a \$146.10 to a \$200.00 funding cap per month per location, and increased 25/3 build-out obligations. While not objecting to them, WTA indicated some uncertainty regarding how the interim 10/1 deployment obligations from the initial ACAM mechanism and the interim 25/3 deployment obligations from the proposed revised ACAM mechanism would interact with respect to the calculation of overall annual deployment milestones.

WTA also favors granting those carriers that previously elected ACAM support on a glide path basis the option to elect increased 25/3 build-out obligations in return for a two-year extension of the term of their existing arrangement.

WTA supports the proposed new model-based support offer to those RoR carriers that previously did not elect to participate in ACAM or the Alaska Plan. WTA believes that it is particularly important and equitable for the new 25/3-based offer of support and build-out obligations to be made available to those carriers that were excluded from the option to participate in the initial ACAM offer due to their previous efforts to meet the broadband needs of their rural customers

WTA supports the Commission’s efforts to update the 4/1 era cost-based RoR high-cost support budget of 2011 to the 25/3 network needs of today. WTA commends the Commission’s restoration of budget control mechanism cuts and its efforts to address the future impacts of inflation and customer broadband-only line (“CBOL”) adoption. WTA would also support the inclusion of the same type of Tribal Broadband Factor in the cost-based support mechanisms as was incorporated

into the new ACAM model offer for Tribal lands. WTA has some continuing concerns regarding the future impact of CBOL adoption upon the budget control mechanism and regarding the potential use of reverse auctions in areas with substantial existing wireline networks and investment, but will address these matters in the further rulemaking.

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

cc: Alexander Minard
Suzanne Yelen
Jesse Jackman
Ted Burmeister