



December 6, 2018

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; ETC Annual Reports and Certifications, WC Docket No. 14-58; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92*

Dear Ms. Dortch:

On Thursday, December 6, 2018, the undersigned on behalf of NTCA–The Rural Broadband Association (“NTCA”) spoke with Preston Wise, special counsel to Chairman Ajit Pai.

During the conversation, NTCA expressed strong support for the draft order with respect to universal service fund (“USF”) support circulated recently for a potential vote by the Federal Communications Commission (the “Commission”) at its December open meeting. NTCA maintains that the draft order as currently designed would take substantial steps toward fulfillment of statutory mandates with respect to predictability and sufficiency, promote the effectiveness of existing USF support mechanisms, and achieve important public policy objectives with respect to promoting network investment and ensuring the availability of services for the benefit of consumers on a reasonably comparable basis between rural and urban areas. As part of the conversation, NTCA also discussed the need for verification of Form 477 data in connection with accurately confirming the extent of any competitive overlap and the importance of properly calibrated buildout obligations that accurately reflect the costs of delivering higher-speed broadband in rural areas.

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 –
Industry Affairs & Business Development

cc: Preston Wise