



December 6, 2019

VIA ECFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: *Rural Digital Opportunity Fund, WC Docket No. 19-126*

Dear Ms. Dortch:

On Wednesday, December 4, 2019, the undersigned, on behalf of NTCA–The Rural Broadband Association (“NTCA”), met with Commissioner Michael O’Rielly and his legal advisor, Arielle Roth, to discuss matters in the above-referenced proceeding.

Specifically, we discussed NTCA’s positions with respect to: (1) the weighting needed to recognize the values of relative speeds and symmetrical services in particular in the Rural Digital Opportunity Fund (“RDOF”) auction; (2) the importance of greater accountability both prior to bids (in the form of improved, but still reasonable, technical vetting of would-be bidders’ plans) and following awards (in the form of reasonable subscribership performance metrics); and (3) the need for thoughtful, carefully planned transitions from prior support mechanisms to RDOF and other auction support, particularly where a provider has outperformed expectations and surpassed prior buildout obligations. NTCA’s advocacy on these points was consistent with prior filings. *See* Comments of NTCA, WC Docket No. 19-126 (filed Sept. 20, 2019), at 4-5, 7-13, 14-16, and 26-30; *Ex Parte* Letter from Michael R. Romano, Sr. Vice President, NTCA, to Marlene H. Dortch, Secretary, Federal Communications Commission (the “Commission”), WC Docket No. 19-126 (filed Dec. 4, 2019).

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
NTCA–The Rural Broadband Association

cc: Commissioner Michael O’Rielly
Arielle Roth