



February 14, 2014

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; High-Cost Universal Service Support, WC Docket No. 05-337; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition; Petition of NTCA for a Rulemaking to Promote and Sustain the Ongoing TDM-to-IP Evolution, GN Docket No. 12-353; Technology Transitions Policy Task Force, GN Docket No. 13-5*

Dear Ms. Dortch:

On Wednesday, February 12, 2014, Shirley Bloomfield, Chief Executive Officer of NTCA–The Rural Broadband Association (“NTCA”), and the undersigned met with Gigi Sohn, Special Counsel for External Affairs in the Office of Chairman Thomas Wheeler, to discuss matters in the above-referenced proceedings.

We first highlighted the proposals submitted by NTCA and its rural telecom partners for targeted refinement of universal service support in areas served by rate-of-return-regulated rural local exchange carriers (“RLECs”) to facilitate consumer choice and stimulate deployment and adoption of broadband. Although discussions regarding alternative voluntary methods of support may be useful as well, NTCA noted that such alternatives will likely take significant time to develop, test, and implement – leaving consumers in RLEC-served areas in the interim unable to participate fully in the “IP evolution” because affordable and sustainable broadband access in such areas remains tethered to continued purchase of traditional telephone service. Resolution of these issues in the near-term must be viewed as an urgent and essential part of any successful, consumer-focused technology transition or national IP evolution strategy.

NTCA then discussed its thoughts on technology transitions. We noted that – while hindered in recent years by substantial regulatory uncertainty around universal service support in the wake of the National Broadband Plan, the 2011 reforms, and the threat of additional “reforms” to come – NTCA members had made tremendous strides in migrating from circuit switching to IP-based softswitches and deploying fiber deeper into their networks in response to consumer demands. We emphasized that the delivery of affordable, high-quality services to consumers remains the mission of all community-based small rural telcos, and we observed too that the significant progress these providers had achieved to date in deploying and offering services to the highest-cost portions of the United States was made within the context of existing regulatory and statutory frameworks. We therefore urged the Federal Communications Commission (the “Commission”) to consider venues to not only “trial” new ideas that may contemplate departures from existing rules, but also ways in which to examine and take stock of the many “success stories” where the core statutory principles of universal service, consumer protection, and competition were served within existing regulatory frameworks and without disruption to or departure from the fundamental services that consumers expect and deserve regardless of underlying network transitions.

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 – Policy

cc: Gigi Sohn