

December 4, 2017

Rebekah P. Goodheart
Tel +1 202 639 5355
rgoodheart@jenner.com

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *In re Connect America Fund*, WC Docket 10-90

Dear Ms. Dortch:

On November 30, 2017, Robert Hance, President and CEO, and Dave Allen, Vice President of Regulatory Compliance and Community Development, Midwest Energy & Communications (via telephone); Michael Romano, Senior Vice President – Industry Affairs & Business Development, NTCA–The Rural Broadband Association; Brett Kilbourne, Vice President, Policy and General Counsel, Utilities Technology Council (“UTC”) (via telephone); and David Salant, Senior Managing Director, FTI Consulting (via telephone); and the undersigned of Jenner & Block LLP representing Midwest Energy & Communications, the Association of Missouri Electric Cooperatives, HomeWorks, Alger Delta & Great Lakes Energy, Indiana Electric Cooperatives, and Arkansas Electric Cooperatives, Inc. (collectively the Rural Coalition) met with Thomas Parisi, Michael Janson, Chelsea Fallon, and Alexander Minard of the Federal Communications Commission’s (“Commission”) Rural Broadband Auctions Task Force; and Martha Stancill and Margaret Wiener of the Wireless Telecommunications Bureau.

In the meeting we discussed our concerns that the complexity of the Connect America Fund (“CAF”) Phase II Auction could deter participation by smaller providers. In particular, we reiterated concerns that package bidding not only increases the complexity of the Auction but may favor larger providers.¹ In addition, the Rural Coalition expressed concern that the CAF Phase II Auction could result in a significant fraction of the budget not being spent and eliminating package bidding could help ameliorate this concern.² The Rural Coalition urged the Commission to make every effort to simplify the CAF Phase II Auction and eliminate package

¹ See Reply Comments of the Rural Coalition, *In re Connect America Fund*, AU Docket No 17-182, WC Docket No 10-90, at 3-6 (Oct. 18, 2017).

² See Comments of the Rural Coalition, *In re Connect America Fund*, AU Docket No 17-182, WC Docket No 10-90, at 12-15 (Sept. 18, 2017).

Marlene H. Dortch
December 4, 2017
Page 2

bidding. If package bidding is not eliminated, we encouraged the Commission to take significant measures to mitigate such concerns.

Please contact me if you have any questions regarding these matters.

Sincerely,

/s/ Rebekah P. Goodheart

Rebekah P. Goodheart
*Counsel for Midwest Energy &
Communications, the Association of
Missouri Electric Cooperatives,
HomeWorks, Alger Delta & Great Lakes
Energy, Indiana Electric Cooperatives, and
Arkansas Electric Cooperatives, Inc.*

cc: Thomas Parisi
Michael Janson
Chelsea Fallon
Alexander Minard
Martha Stancill
Margaret Wiener