



June 21, 2016

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; Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92*

Dear Ms. Dortch:

On Monday, June 20, 2016, the undersigned on behalf of NTCA–The Rural Broadband Association (“NTCA”) met with Stephanie Weiner, legal advisor to Chairman Tom Wheeler.

During this meeting, NTCA expressed appreciation for ongoing efforts to provide greater clarity related to implementation of the recently released universal service fund (“USF”) reform order in the above-referenced proceedings. Along those same lines, NTCA encouraged the Federal Communications Commission (the “Commission”) to develop a clear implementation schedule that will enable all reforms (model and non-model) to take effect at approximately the same time to the extent possible, and to provide carriers with sufficient estimates, calculations, and other data in advance of any implementation deadlines to help inform upcoming USF support elections. To help identify what implementation tasks must be completed as part of any such schedule, NTCA provided the attached chart describing what it believes would represent a logical and necessary sequencing and timing of such tasks consistent with the rules promulgated by the Commission in its recent order.

NTCA further raised specific questions regarding the application of a budget control on USF mechanisms effective as of July 1, 2016, as indicated in a recent implementation/clarification order released by the Wireline Competition Bureau. In particular, NTCA observed that, while obtaining clarification as soon as possible regarding the calculation of the budget control would be helpful as contemplated by the text of the order, the actual language of the rule establishing the budget control prescribes a process providing for greater notice than just a few weeks or days prior to application of the budget control.

Marlene H. Dortch

June 21, 2016

Page 2 of 2

Finally, NTCA indicated that several items presented in its Petition for Reconsideration and/or Clarification should be addressed in short order as part of this same effort to provide carriers with clarity and sufficient data to make informed decisions with respect to USF support elections in coming months. Although NTCA continues to assert that questions of sufficiency and reasonable comparability of the USF programs are of the utmost concern as they affect consumers directly and raise significant questions as to whether the reforms comport with statutory mandates governing USF distribution, the association urged the Commission to address, at a minimum, as soon as possible those questions and concerns raised in the Petition specifically regarding competitive overlap and disaggregation, operating expense limits, capital investment allowances, imputation of access recovery charges, and the management of USF budgets in the event of certain carriers electing but then subsequently declining model support.

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

Enclosure

cc: Stephanie Weiner

PROPOSED SEQUENCE OF EVENTS/NEEDED ACTIVITIES

DATE/MONTH	MODEL	NON-MODEL
April 2016	<ul style="list-style-type: none"> Model Overlap Filings/Challenges 	
June 2016		<ul style="list-style-type: none"> Publish Preliminary Estimate of Potential Budget Control to Take Effect Starting July 2017
July 2016	<ul style="list-style-type: none"> First Model Offers Issued 	<ul style="list-style-type: none"> Define Dataset for Non-Model Competitive Challenge Process Based Upon Model Overlap Filings; Seek PRA Approval for Competitive Challenge Certification Form RoR Represcription Starts (paras. 325-326) Publish Data Estimating OpEx Caps to Take Effect Starting January 2017 (para. 104) Publish Data Estimating CapEx Limits to Take Effect Starting January 2017 (paras. 110, 114)
September 2016		<ul style="list-style-type: none"> PRA Approval Obtained (est.); Competitive Challenge Process Begins Based Upon Defined Dataset of Model Overlap Filings (paras. 123-124)
October 2016	<ul style="list-style-type: none"> 90-Day Acceptance Period for First Model Offers Ends FCC Publishes Revised Model Offers 	<ul style="list-style-type: none"> Publish Preliminary Estimate of Buildout Obligations, based upon estimates of caps/limits/budget control (fn 373)
November 2016	<ul style="list-style-type: none"> 30-Day Acceptance Period for Revised Model Offers Ends FCC Publishes Final Results of Model Elections 	
January 2017	<ul style="list-style-type: none"> Model Support and Buildout Obligations Start 	<ul style="list-style-type: none"> CAF-BLS Support Starts OpEx Caps and CapEx Limits Take Effect FCC Finalizes Results of Competitive Challenge Process
February 2017		<ul style="list-style-type: none"> Carriers File for Disaggregation Based Upon Finalized Competitive Overlap
May 2017		<ul style="list-style-type: none"> USAC Publishes Target for Budget Control for July 2017 (rule 54.901)
July 2017		<ul style="list-style-type: none"> Buildout Obligations, Competitive Overlap/Disaggregation, and Budget Control Start