The voice of mid-size communications companies

April 9, 2015

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

Re: *Ex Parte* Communication: WC Docket No. 10-90

Dear Ms. Dortch:

Bob DeBroux of TDS Telecom, Trey Judy of Hargray Communications, and Genny Morelli and the undersigned of ITTA met separately on April 7, 2015 with Travis Litman in Commissioner Rosenworcel's office and Amy Bender in Commissioner O'Rielly's office, and met separately on April 9, 2015 with Nick Degani in Commissioner Pai's office, Rebekah Goodheart, Allante Keels, and Carter MacMillian in Commissioner Clyburn's office, and Daniel Alvarez in Chairman Wheeler's office to discuss an alternative regulation plan for rate-of-return companies.[1]

We informed staff that ITTA continues to engage other industry stakeholders to develop a consensus approach for a voluntary transition to model-based support for rate-of-return carriers. The basic principles of the approach would include use of a forward-looking model-based universal service support mechanism that aligns available funding with obligations and associated reporting requirements and affords participating carriers reasonable certainty of future revenues over a timeframe that corresponds with investment decisions and funding commitments.

The concepts addressed during our ongoing outreach and discussions include: (1) an appropriate multi-year transition from legacy support to support based on a cost model; (2) the appropriate time frame for the voluntary plan to be made available for carriers to opt in to; (3) possible utilization of jumpstart funding to incentivize early adoption of the plan; (4) the need for a simple and straightforward process for determining areas that are eligible for support; (5) appropriate modifications to the model to further refine it for use in rate-of-return areas; and (6) suitable deployment and reporting obligations that ensure funding is commensurate with build-out requirements and is being used consistent with the Commission's goals.

We continue to work diligently to refine the elements of the proposal with the objective of moving forward as quickly as possible. We fully support adoption of a voluntary, alternative regulation plan by the end of 2015.

Please do not hesitate to contact the undersigned with any questions regarding this submission.

Respectfully submitted,

Micah M. Caldwell
Vice President, Regulatory Affairs

cc: Daniel Alvarez, Amy Bender, Nick Degani, Rebekah Goodheart, Travis Litman, Allante Keels, Carter MacMillian

[1] Ms. Caldwell did not participate in the meeting with Nick Degani.

1101 Vermont Avenue NW, Suite 501 • Washington, DC 20005 • **tel** 202.898.1520 • **fax** 202.898.1589 • www.itta.us