



Advocates for Rural Broadband

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President

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Executive Vice President

April 27, 2015

Filed Via ECFS

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

**RE: WC Docket Nos. 10-90, 14-58, 07-135, and 06-122; WT Docket No. 10-208;
and CC Docket Nos. 96-45 and 01-92**

Dear Ms. Dortch:

On Thursday, April 23, 2015, Jimmy Todd, CEO of Nex-Tech of Lenora, Kansas and Derrick Owens and Gerry Duffy representing WTA – Advocates for Rural Broadband (“WTA”) met with Commissioner Michael O’Rielly and Amy Bender, his Legal Adviser – Wireline, to discuss various matters regarding the Data Connection Service (“DCS”) plan proposed by the Rural Associations and related Universal Service reform and contribution matters.

Mr. Todd indicated that his company serves a rural area in northwestern Kansas that is roughly the size of the State of Maryland. During recent years, customers want to have high-capacity wireline broadband service, but are far less interested in retaining their traditional wired voice service. Mr. Todd indicated that the absence of a DCS mechanism imposes a substantial hardship upon customers who want to take broadband service, but want to use wireless or voice over Internet Protocol (VoIP) technology for their voice service. The current universal service rules preclude support for the same facilities that were serving the customer before he or she terminated voice service.

There was a brief discussion of the fact that various rural telephone groups have begun meeting to work toward presenting a comprehensive plan to support and promote improved broadband service in rate-of-return rural service areas. Mr. Todd urged that universal service contribution reform be addressed expeditiously, for the current contribution base (which is comprised, in substantial part, of declining interstate toll revenues) is becoming increasingly incapable of supporting existing broadband networks and the growing needs for extending the reach and increasing the capacity of the nation’s critical broadband network infrastructure, not to mention supporting the other school, library, rural health care and lifeline programs that rely in major part upon such infrastructure.

Pursuant to Section 1.1206(b) of the Commission's Rules, this submission is being filed for inclusion in the public record of the referenced proceedings.

Respectfully submitted,

/s/ Gerard J. Duffy

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