



July 16, 2015

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, D.C. 20554

RE: **Ex parte filing** in WC Docket No. 10-90

Dear Ms. Dortch:

On July 15, Jeffrey H. Smith (via telephone) and the undersigned from GVNW Consulting, Inc. (GVNW) conducted an *ex parte* meeting with Nicholas Degani from Commissioner Pai's office.

The *ex parte* meeting covered Commissioner Pai's plan to support broadband deployment in rural America.¹ GVNW is in agreement with Commissioner Pai that targeted changes to existing universal service rules can solve the stand-alone broadband problem. With respect to use of a cost model to determine high-cost USF support for rate-of-return carriers, we also agreed that participation in the model should be voluntary, that the model should last for 10 years and that support should target unserved locations that will meet the Connect America Fund's 10/1 broadband benchmark.

We also discussed the potential transition for carriers electing model support where that support would decrease under the A-CAM. We covered the use and level of reserves that could fund some of the additional support that may be required by those choosing model support and how to prioritize those electing model support if funding dedicated to the model is inadequate. We discussed the access regulatory regime under which those electing model support would operate.

Finally, we noted that equal treatment for rate-of-return and price-cap carriers demands adoption, as part of USF reform for rate-of-return carriers, of the Consensus Alaska Plan based on 2011 costs.

¹ See Press Release, Commissioner Pai Announces Rural Broadband Plan (rel. June 29, 2015) with accompanying Appendix "Targeted Rule Changes to Support Stand-Alone Broadband."

As required by the Commission's rules, this ex parte record is now filed in the above referenced docket. If there are any questions, please call me on 202-236-3947.

Respectfully submitted,

Via ECFS 7/16/15

David B. Cohen
Senior Policy Advisor

Cc: Nicholas Degani, FCC