



The voice of mid-size communications companies

December 8, 2015

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

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

Dear Ms. Dortch:

On December 7, 2015, Micah Caldwell and the undersigned of ITTA met with Amy Bender, Commissioner O’Rielly’s Wireline Legal Advisor and on December 8, 2015 Micah Caldwell and the undersigned met with Nick Degani, Commissioner Pai’s Wireline Legal Advisor to discuss matters in the above-captioned proceeding.

The discussion in each meeting focused on elements of proposed universal service reform for the rate-of-return industry. ITTA stated its ongoing support for the Commission’s efforts to reform current rate-of-return USF support mechanisms consistent with stated Commission goals. ITTA expressed confidence that remaining open issues can be resolved in concert with industry and its view that the Commission can and should move forward expeditiously to adopt the reforms being contemplated.

Consistent with prior advocacy, we discussed various elements of the voluntary model-based universal service support plan under consideration by the Commission. More specifically, we discussed the broadband speed requirement that would apply to participating carriers. We also addressed how the build-out obligations for carriers participating in the model-based plan would be set and whether and how the current broadband build-out level of a participating carrier should be taken into account in determining the number of locations the carrier is required to build out to under the plan. Finally, we discussed the level of additional support dollars that should be incorporated annually into the model-based plan by the Commission.

Ms. Marlene H. Dortch  
December 8, 2015  
Page 2

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

Respectfully submitted,

A handwritten signature in black ink that reads "Genevieve Morelli". The signature is written in a cursive style with a large initial "G".

Genevieve Morelli  
President

cc: Amy Bender  
Nick Degani