



The voice of mid-size communications companies

January 19, 2016

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:

On November 19, 2015, ITTA filed a letter regarding the speed requirement that would apply to rate-of-return (RoR²) companies participating in the voluntary model-based universal service support plan under consideration in this proceeding.¹ In response to the Commission's interest in increasing the speed standard from the 10/1 Mbps standard previously established for price-cap carriers, ITTA proposed that the Commission take into account the density of the study area served by a RoR carrier. RoR carriers serve some of the highest cost areas of the nation. The ability to deploy broadband at 25/3 Mbps, 10/1 Mbps, or some lower speed to particular locations is directly related to the cost of serving those locations and density is a primary driver of cost. ITTA therefore proposed that companies with a density of more than 10 locations per square mile be required to build out at the 25/3 Mbps speed by the end of the 10-year term of the plan to 75% of fully-funded eligible locations in the study area and companies with a density of 10 or less locations per square mile be required to build out at the 25/3 Mbps speed by the end of the 10-year term to 50% of fully-funded eligible locations.²

Although it is unlikely that all eligible locations of participating carriers will be fully funded under the model-based plan, we understand that all eligible locations likely will receive some capped level of funding and that the Commission has been considering some form of a "reasonable request" standard for those eligible locations. We also understand that the Commission desires that over time all customers have access to some level of broadband. ITTA proposes that any deployment requirement established for locations that are not fully funded should recognize the density of the area and the significant commitment that has been made to

¹ See Letter from Genevieve Morelli, ITTA, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 10-90 (filed Nov. 19, 2015).

² *Id.* at 3.

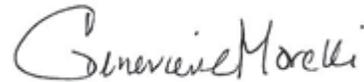
Ms. Marlene H. Dortch
January 19, 2016
Page 2

use model-based funding to deploy at the 25/3 Mbps speed to a significant percentage of fully-funded locations and 10/1 Mbps to the remainder.

Specifically, ITTA proposes that should the Commission decide to adopt a deployment expectation beyond “reasonable request” for locations that are not fully funded, participating companies with a density of more than 10 locations per square mile be required to build out at the 4/1 Mbps speed by the end of the 10-year term of the plan to 50% of their partially-funded eligible locations and participating companies with a density of 10 or less locations per square mile be required to build out at the 4/1 Mbps speed by the end of the 10-year term of the plan to 25% of their partially funded eligible locations. ITTA proposes further that if a particular company cannot meet this expectation because of the economics of some of these very high cost areas, the company should have an opportunity to provide the necessary information to demonstrate to the Commission why the expectation cannot be met.

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

Respectfully submitted,



Genevieve Morelli
President

cc: Carol Matthey
Suzanne Yelen
Alex Minard
Katie King
Stephanie Weiner
Amy Bender
Rebekah Goodheart
Travis Litman
Nick Degani