



1634 Eye Street NW  
Suite 510  
Washington, D.C. 20006

Joe A. Douglas  
Vice President  
Government Relations  
PH 202-682-0153  
FX 202-682-0154  
jdouglas@neca.org

June 4, 2010

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St. SW  
Washington, DC 20554

Re: *In the Matter of a National Broadband Plan for Our Future*, GN Docket No. 09-51.

Dear Ms. Dortch:

On June 3, 2010, Jim Frame and Regina McNeil from NECA; Dan Mitchell, Jill Canfield, and Tom Wacker from NTCA; Stuart Polikoff, Catherine Moyer, and Roger Nishi from OPASTCO; Gerry Duffy, Bob DeBroux, and Jason Hendricks from WTA; and Paul Cooper from the Rural Alliance (RLECs) met with Sharon Gillett, Wireline Competition Bureau (WCB) Chief; Carol Matthey, WCB Deputy Chief; WCB staff Amy Bender, Ted Burmeister, Rebekah Goodheart, John Hunter, Katie King, Al Lewis, Marcus Maher, Alexander Minard, Gary Seigel, and Donald Stockdale; and Office of Strategic Planning & Policy Analysis (OSP) staff Lisa Gelb, Elise Kohn, and Steve Rosenberg to discuss the National Broadband Plan (Plan).

In particular, the RLECs discussed issues relating to the Plan that are of importance to rate-of-return rural carriers. Concerns were voiced regarding the insufficient size of the proposed Connect America Fund to achieve either national broadband goals or Congressional mandates. The RLECs explained how limiting funding in rural areas to 4 Mbps broadband Internet access service, while targeting 100 Mbps service in urban areas, will create a digital divide. The group pointed out how a freeze on interstate common line support (ICLS) and mandatory conversion from rate-of-return regulation to incentive regulation will have an immediate negative impact on carriers and the customers they serve, and impact carriers' ability to obtain financing.

The RLECs also discussed the lack of transparency with the commission's current proposed broadband cost model and how the proposed model does not accurately reflect the actual costs associated with RLEC networks serving high-cost rural communities. Finally, the RLECs expressed concern regarding making piecemeal decisions before other regulatory issues are resolved.

This letter of notice of our *ex parte* meeting has been filed via the Commission's Electronic Comment Filing System in accordance with FCC rules. Questions regarding this meeting may be directed to my attention.

Sincerely,

A handwritten signature in black ink that reads "Joe A. Douglas". The signature is written in a cursive, flowing style.

CC:  
Sharon Gillett  
Carol Matthey  
Amy Bender  
Ted Burmeister

Lisa Gelb  
Rebekah Goodheart  
John Hunter  
Katie King  
Elise Kohn  
Al Lewis  
Marcus Maher  
Alexander Minard  
Steve Rosenberg  
Gary Seigel  
Donald Stockdale