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September 18, 2015

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *Connect America Fund*, WC Docket No. 10-90

Dear Ms. Dortch:

On September 17, 2015, the undersigned, Steven Meltzer, Douglas Meredith, Gordon Dauchy, Ryan Denzel and Marty Klueh of JSI participated in a teleconference with Katie King, Alex Minard, Suzanne Yelen, Steven Rosenberg and Talmage Cox of the FCC's Wireline Competition Bureau. We discussed the Alternative Connect America Cost Model ("A-CAM") and its underlying data.

JSI staff presented scenarios in which rural rate-of-return carriers would lose universal service support under the A-CAM based on the strict application of FCC Form 477 ("Form 477") data and without regard to affiliate relationships. For example, using Form 477 data recently updated in A-CAM version 1.1, the FCC reports a third party cable competitor presence in rural ILEC census blocks where in fact the cable provider is an affiliate of that same ILEC. In some cases, the ILEC provides fixed wireless as the best option to serve its own customers in challenging terrain and finds the FCC eliminates support for those census blocks based solely on the presence of fixed wireless technology—data provided through Form 477. Bureau staff confirmed the A-CAM is driven by the Form 477 data technologies without cross-checking landline alternative technologies as well as holding company relationships and recognizes this is an issue that warrants further consideration. Bureau staff indicated there has been no decision made as to whether affiliates will be treated as competitors for the purpose of the A-CAM.

JSI staff relayed other client concerns about accuracy of the Form 477 data which underlies the A-CAM and is used to implement the 100 percent overlap policy. Where an ILEC in a small serving area can definitively state there is no competitive provider in certain census blocks, a process should be available to challenge the third party provider's representation they can serve those blocks. Bureau staff acknowledged certain parties have advocated for a challenge process. Bureau staff further emphasized filers certify to the accuracy of their Form 477 data and are obligated to revise that data if incorrect.

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Please contact the undersigned with any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John Kuykendall". The signature is written in a cursive style with a large initial "J" and "K".

John Kuykendall
Vice President

cc: Katie King
Alex Minard
Suzanne Yelen
Steven Rosenberg
Talmage Cox