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September 22, 2017

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: Broadband Location Reporting Requirements
WC Docket No. 10-90**

Dear Ms. Dortch:

On Wednesday, September 20, 2017, John Kuykendall and Cassandra Heyne of John Staurulakis, Inc. (“JSI representatives”) met with Alexander Minard, Suzanne Yelen, Talmadge Cox, and Jonathan Lechter of the Wireline Competition Bureau (“Bureau”). The discussions primarily focused on the reporting requirements for rate-of-return carriers receiving CAF-BLS support that do not have defined buildout obligations. These carriers must report on their annual Form 481 filing “progress on the number of locations where 10/1 Mbps or better broadband service have been deployed within their study area during the prior calendar year.”¹ During the discussions, the JSI representatives provided recommendations as to how the Bureau can obtain this information in the least burdensome manner. The participants also discussed issues related to the implementation of HUBB reporting for rate-of-return carriers with build-out obligations.

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall, Vice President
301-459-7590; jkuykendall@jsitel.com

Cc: Suzanne Yelen
Alexander Minard
Talmadge Cox
Jonathan Lechter

¹ *Connect America Fund*, WC Docket Nos. 10-90, et al., Report and Order, Order and Order on Reconsideration and Further Notice of Proposed Rulemaking, FCC 16-33, ¶ 173 (rel. Mar. 30, 2016).