



August 2, 2019

Marlene Dortch
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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

Dear Ms. Dortch:

On Wednesday, July 31, 2019, Don Jackson of Tri County Telephone (TCT) (Cody, Wyoming) and the undersigned met with Suzanne Yellen, Ian Farber and Steven Wang to discuss performance measurement testing; Alec MacDonnell joined the meeting by phone. The parties presented staff with information relating to the anticipated processes, costs and labor hours contemplated by the relevant regulations. The parties noted their general support for the goals intended to be fulfilled by performance measurement testing, and characterized the presentations made in this meeting to be in the spirit of sharing with the Commission information that has been developed as TCT prepares for compliance.

TCT operates as both an incumbent rural local exchange provider (ILEC) and competitive local exchange carrier (CLEC) in north-central Wyoming. It is a recipient of universal service fund (USF) support and was a successful bidder in the CAF II reverse auction. Its ILEC service area covers approximately 5,200 square miles, throughout which approximately 4,800 broadband subscribers are distributed.

As the parties revisited NTCA's general support for performance measurement testing as a valuable aspect of network and regulatory administration, TCT noted that it has tested its network regularly for the past 18 years. In preparing for the implementation of performance measurement obligations, TCT has undertaken a detailed study of its service area, available equipment and methods of deploying testing-capable equipment to its participating subscribers. Using the attached maps as illustration, TCT identified its operating headquarters in Basin, Wyoming, as the starting point for calculating geographic distances and labor hours. TCT divided its service territory into concentric rings demarcated by mileage bands at 25, 50 and 100 miles. TCT also calculated the relative proportion of its subscribers within each mileage band. TCT then calculated the cost of mileage and labor hours for the installation and recovery of testing equipment. These data are reflected on the attached spreadsheets. The parties and staff discussed the relative need for the company to deliver, rather than ship, testing compliant equipment to subscriber locations. TCT submits, based on its experience, that a truck roll will be necessary to deliver testing-compliant equipment to most of its participating customers. TCT also notes that the driving time estimates are based upon "clear blue sky" weather conditions;

adverse weather conditions in the rugged areas in which TCT providers service will demand slower driving speeds and, accordingly, increase labor hours. In addition to the “known” costs as estimated on the spreadsheets, TCT anticipates unknown costs that will be incurred for location substitution; whether testing equipment is retrieved or new equipment is purchased for subsequent testing cycles; data collection and rendering; and, customer discounts or other incentives as may be necessary to recruit customer participation.

NTCA submits that the data assembled by TCT informs the Commission’s current inquiry as required by the Paperwork Reduction Act, specifically, the estimated time per response. TCT’s analysis demonstrates that numerous staff and labor hours beyond data collection and reporting will be necessary as providers comply with the performance measurement requirements. These data may inform the Commission’s analysis as the various petitions for reconsideration and application are reviewed, including those petitions for a reduction in the number of locations small providers must test.

As set forth above, the presentation offered contextual information against which the Commission can measure the development of the final rules as well as efforts to provide guidance for provider compliance.

Pursuant to Section 1.1206(b) of the Commission’s Rules, this letter is filed for inclusion in the public record of the above-captioned proceeding.

Respectfully submitted,

s/Joshua Seidemann

Joshua Seidemann
Vice President, Policy
NTCA–The Rural Broadband Association
4121 Wilson Blvd., Suite 1000
Arlington, VA 22203
703-351-2000
www.ntca.org

ATTACHMENTS

cc: Suzanne Yellen
Ian Farber
Steven Wang
Alec MacDonnell