



March 9, 2020

**VIA ECFS**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**RE: *The Rural Digital Opportunity Fund Auction (Auction 904), AU 20-34; Rural Digital Opportunity Fund, WC Docket No. 19-126; Connect America Fund, WC Docket No. 10-90***

Dear Ms. Dortch:

On Thursday, March 5, 2020, the undersigned on behalf of NTCA–The Rural Broadband Association, and Brian O’Hara, Senior Director for the National Rural Electric Cooperative Association, met with Ryan Palmer, Alexander Minard, and Katie King of the Wireline Competition Bureau to discuss matters in the above-referenced proceedings.

We first discussed the interplay of federal and state programs in connection with the eligibility of areas for Rural Digital Opportunity Fund (“RDOF”) support. We emphasized the importance of ensuring that recipients of RDOF support – which provides ongoing support and is not distributed upfront as a grant – can obtain appropriate financing through other means, including Rural Utilities Service programs, for construction and other upfront network deployment activities. We also urged the Federal Communications Commission (the “Commission”) to consider in more detail the ways in which the RDOF program and other federal and state programs might be leveraged in tandem to achieve better and faster broadband deployment than might otherwise be the case in the absence of such collaborative efforts.

We next discussed the importance of ensuring that service providers will be capable of delivering on the promises they make when bidding in the RDOF auction. In the first instance, it is critical for the integrity of the auction that the Commission undertake reasonable efforts to ensure that providers have realistic plans to construct and operate a network capable of performing in the tiers they would intend to bid for in the auction. An essential corollary to this is that, if a particular technology is not being used to offer commercial service today in rural areas on a comparable scale to the bids it would place, such service should be ineligible to bid in the auction at such a level – and this should certainly hold true for any experimental technology that is not offering commercial service at all. Indeed, rather than presuming experimental technologies can and will deliver service until a vetting process might find otherwise, the presumption should be that such technologies cannot perform at the asserted level unless and until they make a detailed showing that they can.

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Put another way, if the goal is to promote true technological neutrality, the same rule that applies to all *existing* technologies – *i.e.*, that they are eligible to bid only in the tiers in which they operate on a generally available basis – must by definition apply with equal force to experimental and existing technologies alike.

Thank you for your attention to this correspondence. Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS.

Sincerely,

/s/ Michael R. Romano

Michael R. Romano

Senior Vice President –

Industry Affairs & Business Development

NTCA–The Rural Broadband Association

cc: Ryan Palmer  
Alexander Minard  
Katie King