



April 1, 2020

VIA ECFS

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

RE: Protecting Against National Security Threats to the Communications Supply Chain Through FCC Programs, WC Docket No. 18-89

Dear Ms. Dortch:

NTCA – The Rural Broadband Association (“NTCA”) is submitting this letter in support of the Request for Extension filed by the Rural Wireless Association (“RWA”) of the April 22, 2020 deadline for Eligible Telecommunications Carriers (“ETCs”) to submit information to the Federal Communications Commission (“Commission”) identifying whether their networks contain any Huawei or ZTE equipment or services.¹

The impacts of the immediate COVID-19 crisis on service providers’ operations warrant an extension. Service providers, and especially smaller ones, are focused here and now on continuity of operations, including ensuring that many employees can work from home, that those who cannot work from home are adequately protected, and that their networks and customer service functions are able to accommodate demand by consumers for new installations or increased bandwidth (or even just basic repair) in residential locations. Some NTCA members report a 20-50% spike in network usage, and many of the same employees that would obtain and prepare the information necessary to respond to the Commission’s information collection also need to closely monitor network usage and make immediate adjustments when necessary. Moreover, NTCA members indicate that certain of the employees needed to identify the affected equipment and services and obtain estimates for the cost of replacing such equipment and services are now required to work from home, making it even more difficult to inventory and record individual pieces of equipment distributed in various offices and other service locations.

¹ See *Protecting Against National Security Threats to the Communications Supply Chain Through FCC Programs*, Request for Extension of Time to Report Supply Chain Security Information, WC Docket No. 18-89, Rural Wireless Ass’n (filed March 24, 2020) (“Extension Request”).

NTCA members also report of concerns related to the complications of ensuring that quotes for new equipment and services to replace the materials that will be ripped out capture necessary functionalities and capabilities, which involves an iterative process between vendors and operational personnel. To pull operational personnel off of mission-critical network management and service installation and repair tasks now to undertake a complex review of the equipment and services contained in their networks, including identifying and debating with vendors how such equipment and services fit into the categories contained in the Commission's information collection system and/or would represent a suitable replacement technology, would represent a diversion of attention and resources that are badly needed elsewhere right now.

Consistent with RWA's suggestion in the Extension Request, the Commission could continue to require ETCs that do not have any ZTE or Huawei equipment or services in their network to make that certification by April 22, 2020.² This would at least provide the Commission, by process of elimination, with a notion of how many ETCs have ZTE or Huawei equipment and/or services in their networks, which may in turn help the Commission begin to identify the length of time that will be needed to allow for the installation of replacement equipment and services and perhaps even a "ballpark" estimate of the extent of such replacement.

NTCA also supports RWA's request for additional clarification or guidance with respect to how the different types of equipment and services are to be classified, as well as how ETCs unable to replace their existing equipment or services with "functionally equivalent" equipment or services – due to the fact that such equipment or services are no longer commercially available – should estimate the cost of replacing their equipment and services.³ Ensuring consistency in how the equipment and services are identified, as well as the cost of replacing identified equipment and services, will allow the Commission to obtain the most accurate cost information possible and thereby identify the amount of funding needed to reimburse ETCs for the cost of removing and replacing covered equipment.

Thank you for your consideration of this correspondence and for an extension of some duration to help providers in assessing the extent of such equipment and services in their operations. Please contact the undersigned if you have any questions regarding these matters.

Sincerely,

/s/ Michael Romano

Michael Romano

Senior Vice President –

Industry Affairs & Business Development

² See RWA Extension Request at p. 6.

³ See, e.g., Reply Comments of NTCA – The Rural Broadband Ass'n, WC Docket 18-89 (March 3, 2020) pp. 6-7.