



November 18, 2020

Notice of Ex Parte

Marlene Dortch
Office of the Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

**Re: *Connect America Fund: Performance Measures for
Connect America High-Cost Universal Service
Support Recipients***
Docket No. 10-90; DA 17-1085

Dear Ms. Dortch:

On November 16, 2020, Michael Romano and the undersigned visited via telephone with Suzanne Yelen and Gilbert Smith of the Wireline Competition Bureau to discuss the above-captioned docket. Specifically, we discussed anticipated impacts of COVID-19 related conditions on carrier compliance with performance measurement testing obligations and potentially on future deployment milestones.

We first shared with Commission staff reports that supply chain disruptions are expected to delay carrier receipt of testing-capable equipment well until into the first quarter of 2021. These delays are not restricted to a single vendor but have rather been reported by carriers who are working with multiple product providers and extend timeframes for order fulfillment well beyond previously experienced intervals.¹

Moreover, consistent with concerns recognized by the Commission itself in previously modifying certain pre-testing requirements applicable to other providers, we also shared carriers' experience that COVID-19 spikes throughout the country, and particularly in regions served by

¹ See, i.e., "Building a More Resilient ICT Supply, Chain: Lessons Learned During the COVID-19 Pandemic," Cybersecurity & Infrastructure Security Agency, Communications Sector Coordinating Council, and Information Technology Sector Coordinating Council (Nov. 2020) (https://www.cisa.gov/sites/default/files/publications/lessons-learned-during-covid-19-pandemic_508_1.pdf) (visited Nov. 18, 2020).

rural carriers, have complicated company personnel efforts to enter homes to deploy new equipment.² We related that many companies expect that a truck roll will be necessary to deliver and deploy testing-capable devices.

Accordingly, we discussed the need for adjustments to pre-testing protocols that will meet the Commission's goals while recognizing the constraints borne of the pandemic and the escalating supply chain concerns in the broadband equipment marketplace. We also urged the Commission to work with other agencies and stakeholders to monitor the effects of these events on the ability of providers to achieve deployment milestones in the future and otherwise advance the deployment of broadband.

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 with ECFS.

Respectfully submitted,

/s/ Joshua Seidemann
Joshua Seidemann
Vice President of Policy

cc: Suzanne Yelen
Gilbert Smith

² See, *Connect America Fund: Order*, Docket No. 10-90, DA 20-748 (Jul. 17, 2020).