



November 27, 2020

VIA ECFS

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
45 L Street, NE  
Washington, DC 20554

**RE: *Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42; Telecommunications Carriers Eligible for Universal Service Support, WC Docket No. 09-197; Connect America Fund, WC Docket No. 10-90***

Dear Ms. Dortch:

On Tuesday, November 24, 2020, the undersigned on behalf of NTCA–The Rural Broadband Association (“NTCA”) spoke with Lisa Hone, deputy chief of the Wireline Competition Bureau, regarding the above-referenced proceedings. On Wednesday, November 25, 2020, I held separate conversations with: (1) Allison Baker, economic advisor to Chairman Ajit Pai; (2) Travis Litman, chief of staff to Commissioner Jessica Rosenworcel; (3) Joseph Calascione, legal advisor to Commissioner Brendan Carr; and (4) Arielle Roth, legal advisor to Commissioner Michael O’Rielly, regarding the same subject matter.

In each conversation, NTCA discussed an issue identified recently related to the phasedown of Lifeline support for voice-only customers and its interplay with cost recovery under the High-Cost universal service program. Specifically, for many eligible telecommunications carriers (“ETCs”), the reduction of the Lifeline subsidy for such customers to \$5.25 per month effective December 1, 2020, precludes recovery of the full amount of the Subscriber Line Charge (“SLC”), and it appears that these shortfalls may be unrecoverable through the High-Cost program. NTCA expressed its desire to work with the Federal Communications Commission (the “Commission”) to identify further how existing rules affect such recovery and/or to seek possibly a waiver of the Lifeline subsidy phasedown with respect to such voice-only customers of ETCs that impose a SLC.

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: Allison Baker  
Travis Litman  
Joseph Calascione  
Arielle Roth  
Lisa Hone