



December 14, 2020

Marlene Dortch
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

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

Dear Ms. Dortch:

On October 20, 2020, NTCA–The Rural Broadband Association (NTCA) filed a petition for rulemaking in the above-captioned docket. NTCA requested the Commission to amend 47 C.F.R. § 54.313 to relieve certain rate-of-return carriers of the obligation to submit audited financial statements to the Commission; the requested relief is aimed at carriers that obtain high-cost support through the Alternative Connect America Model (ACAM) or other mechanisms that derive from fixed support. As explained in the petition, the Commission ruled in the 2011 *Transformation Order* that publicly traded companies and privately held recipients of model-based support would not be subject to certain financial reporting requirements because such support mechanisms “will be disciplined by market forces.”¹ Therefore, NTCA requested that similar relief be extended to carriers who accept support through subsequently promulgated models or other sources of fixed support, as the same principles apply.

Notably, and perhaps unsurprisingly, no party has filed in opposition to the NTCA request. Grant of the NTCA request will place similarly situated companies on equal regulatory footing, and moreover relieve Commission staff from the burden of reviewing financial statements whose affirmations of fiscal integrity have already been fulfilled by the Commission’s own disciplined processes. Accordingly, NTCA requests the Commission to implement the amendment of the rule as set forth in the petition.

Respectfully submitted,

s/ Joshua Seidemann
Joshua Seidemann
Vice President, Policy

¹ *Connect America Fund (Dkt. No. 10-90)*; *A National Broadband Plan for Our Future (Dkt. No. 09-51)*; *Establishing Just and Reasonable Rates for Local Exchange Carriers (Dkt. No. 07-135)*; *High-cost Universal Service Support (Dkt. No. 05-337)*; *Developing a Unified Intercarrier Compensation Regime (Dkt. No. 01-92)*; *Federal-State Board on Universal Service (Dkt. No. 9645)*; *Lifeline and Link-Up (Dkt. No. 03-109)*; *Universal Service Reform – Mobility Fund (Dkt. No. 10-208)*; *Report and Order and Further Notice of Proposed Rulemaking*, FCC 11-161 at para. 596 (2011) (*Transformation Order*).