



February 22, 2021

VIA ECFS

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

**RE: *Emergency Broadband Benefit Program, WC Docket No. 20-445***

Dear Ms. Dortch:

On Friday, February 19, 2021, the undersigned on behalf of NTCA–The Rural Broadband Association (“NTCA”) spoke with Christian Hoefly of the Wireline Competition Bureau. During the conversation, NTCA identified the need for reasonable measures that will promote accountability in the administration of the new Emergency Broadband Benefit (“EBB”) program while also providing flexibility and avoiding burdens that might deter providers from participating in the program. For example, to comply with the statutory requirement that the “standard rates” charged for services to eligible households under the EBB program are not higher than those charged to consumers for such services as of December 1, 2020, we discussed the use of price lists with links to a provider’s website information or supported by examples of other existing documentation (including, but not limited to, prior customer bills) indicating that the provider had charged such rates for the relevant services as of that date.

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: Christian Hoefly