



March 24, 2021

VIA ECFS

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

RE: *Connect America Fund, WC Docket No. 10-90; ETC Annual Reports and Certifications, WC Docket No. 14-58; Developing a Unified Intercarrier Compensation Regime, WC Docket No. 01-92; Connect America Fund – Alaska Plan, WC Docket No. 16-271; Expanding Broadband Service Through the ACAM Program, RM No. 11868*

Dear Ms. Dortch:

On Tuesday, March 23, 2021, the undersigned, on behalf of NTCA–The Rural Broadband Association (“NTCA”), spoke with Suzanne Yelen of the Wireline Competition Bureau regarding matters in the above-referenced proceedings.

First, NTCA discussed the need for action on several important measures related to universal service fund (“USF”) support received by smaller rural operators. Specifically, NTCA renewed its request for the Federal Communications Commission (the “Commission”) to waive the application of the budget control mechanism to certain kinds of USF support in the face of challenges brought on by the pandemic, especially in light of providers’ increased efforts to deploy broadband to customers lacking connectivity during this crisis and the potential for increased budget control cuts. *See, e.g., Ex Parte Letter from Michael R. Romano, Sr. Vice President, NTCA, to Marlene H. Dortch, Secretary, Commission, WC Docket No. 10-90 (filed May 7, 2020).* Similarly, NTCA reiterated support for prompt action on the petition submitted by the ACAM Broadband Coalition to update, enhance, and expedite deployment obligations for certain providers in exchange for several years of additional support. *See Petition for Expedited Rulemaking of the ACAM Broadband Coalition, RM No. 11868 (filed Oct. 30, 2020).*

Second, NTCA asked the Commission to consider ceasing the collection of high-cost loop support data from providers that have elected model-based support and for whom such data are no longer needed for support calculation purposes. NTCA observed that such data are unnecessary for purposes of regulating such providers and that relieving providers of the burden of submitting this information would allow them to focus efforts and resources more effectively on service delivery and other operations. Similarly, I urged the Commission to act on NTCA’s pending petition for rulemaking related to the filing of audited financial information by smaller providers receiving fixed forms of USF support. *See Petition for Rulemaking of NTCA, WC Docket No. 10-90, et al. (filed Oct. 20, 2020).*

March 24, 2021

Page 2 of 2

Finally, NTCA discussed procedures related to the filings of Forms 509 and asked the Commission to provide reasonable flexibility with respect to revisions of such filings where it is determined that modifications are necessary to address the categorization of certain investments in network plant assets.

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: Suzanne Yelen