



April 28, 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*

Dear Ms. Dortch:

On Tuesday, April 27, 2021, the undersigned on behalf of NTCA–The Rural Broadband Association (“NTCA”) spoke with Suzanne Yelen and Ted Burmeister of the Wireline Competition Bureau.

During this conversation, I renewed NTCA’s prior requests for the Federal Communications Commission (the “Commission”) to waive the application of the budget control mechanism to certain kinds of universal service support in the face of cash flow concerns and other challenges brought on by the pandemic. *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). The application of support cuts would be particularly harmful as providers strive to keep Americans facing economic challenges brought on by the pandemic online despite unpaid bills. I emphasized the pressing nature of such relief given that it appears providers may face significantly increased budget control cuts starting in the next few months, representing an unfortunate and unnecessary “reward” for their increased efforts to expand broadband coverage and deliver higher-quality broadband services to consumers desperately in need of such access in the midst of a pandemic. NTCA further observes that such action by the Commission would be consistent with a series of waivers and other extraordinary relief it has granted during the pandemic (often on its own motion) to address the effects of this crisis on operators and consumers. *See, e.g., Rural Health Care Universal Service Support Mechanism*, WC Docket No. 02-60, *Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order (rel. Dec. 14, 2020) (extending waivers previously granted *sua sponte* with respect to E-Rate and Rural Health Care gift rules); *Lifeline and Linkup Modernization*, WC Docket No. 11-42, Order (rel. Apr. 29, 2020) (adopting a *sua sponte* waiver with respect to showings for Lifeline eligibility); *Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order (rel. Apr. 1, 2020) (waiving a series of E-Rate filing and service implementation deadlines).

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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
Ted Burmeister