



June 4, 2021

***Ex Parte Notice***

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
45 L Street, N.E.  
Washington, D.C., 20554

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

Dear Ms. Dortch:

On Thursday, June 3, 2021, the undersigned on behalf of NTCA–The Rural Broadband Association (“NTCA”)<sup>1</sup> met with Trent Harkrader, Acting Special Advisor to Jessica Rosenworcel, Acting Chairwoman of the Federal Communications Commission (“Commission”). NTCA noted the ongoing difficulties that small providers across the nation face with respect to successfully enrolling into the National Lifeline Accountability Database (“NLAD”) consumers deemed eligible for the Emergency Broadband Benefit Program (“EBB”) Program by the National Verifier.

NTCA indicated that the continuing NLAD enrollment issues that providers have faced since the launch of the EBB often come down to the “format” of potential enrollees’ information as found on applications filed with the National Verifier – a provider must enter into the NLAD personal information, including addresses, belonging to the potential enrollee in the very same manner as the enrollee has on file in his or her application to the National Verifier. For example, if an applicant enters his or her address on the application to the National Verifier and abbreviates “street,” the failure to abbreviate on the part of a provider when attempting to enroll the subscriber will result in a rejection by the NLAD. This is common for both Tribal and non-Tribal consumers, as well as those already enrolled in the Lifeline program and those not participating in that program. In some instances, “trial and error” (though time-consuming) can resolve the discrepancy – and when that fails, interaction with the Universal Service Administrative Company (“USAC”) may help to resolve the problem and result in the eligible consumer being successfully enrolled in the NLAD. However, the sheer volume of EBB applicants prevented USAC from helping to resolve the enrollment problems experienced by many small, rural providers. As NTCA noted, these enrollment issues not resolved by the June 1, 2021 “snapshot” date prevented numerous consumers from receiving the EBB subsidy for the month of May.

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<sup>1</sup> NTCA represents approximately 850 providers of high-quality voice and broadband services in the most rural parts of the United States. In addition to voice and broadband, many NTCA members provide wireless, video, and other advanced services in their communities.

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NTCA then stated that the May 28, 2021 Order<sup>2</sup> denying a Petition to waive the June 1, 2021 “snapshot” date and thus allow additional time to resolve these issues, and provide much needed EBB support to consumers deemed eligible by the National Verifier, may merit revisiting. No party is seeking to undermine the important role of the NLAD in enforcing the “one-per-household” rule. Indeed, as NTCA noted, the Commission could grant the relief as requested while ensuring that these very same subscribers are not receiving the program’s subsidy from another participating provider. NTCA discussed various options for doing so.

NTCA then discussed various options for resolving these enrollment issues going forward to ensure they do not take place again, and expressed appreciation for the Commission’s efforts to remove barriers to EBB participation by consumers in the future.

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/ Brian Ford

Brian Ford

Director of Industry Affairs

NTCA–The Rural Broadband Association

cc: Trent Harkrader

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<sup>2</sup> *Emergency Broadband Benefit Program*, WC Docket No. 20-445, Order, DA 21-635 (rel. May 28, 2021).