



June 1, 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 Thursday, May 27, 2021, the undersigned on behalf of NTCA–The Rural Broadband Association (“NTCA”) spoke with Danielle Thumann, legal advisor to Commissioner Brendan Carr, and Austin Bonner, legal advisor to Commissioner Geoffrey Starks, regarding matters in the above-referenced proceeding. In each conversation, I discussed NTCA’s 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).

I explained how 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 providers will face substantial reductions in support due to the budget control mechanism starting on July 1, 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). Finally, I addressed how the budget control mechanism could likely have negative impacts in future periods as well, given that long-term investments and ongoing operations to deliver service on these networks have recurring effects on the need for support over time.

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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: Danielle Thumann  
Austin Bonner