



November 3, 2021

VIA ECFS

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

RE: *Lifeline & Linkup Reform Modernization, WC Docket No. 11-42; Connect America Fund, WC Docket No. 10-90; Telecommunications Carriers Eligible for Universal Service Support, WC Docket No. 09-197; WTB Seeks Comment on the Global Semiconductor Shortage, WT Docket No. 21-195*

Dear Ms. Dortch:

On Monday, November 1, 2021, the undersigned on behalf of NTCA–The Rural Broadband Association (“NTCA”) spoke with Ramesh Nagarajan, Acting Wireline Legal Advisor to Acting Chairwoman Jessica Rosenworcel, regarding matters in the above-referenced proceedings.

Consistent with prior advocacy, I first updated Mr. Nagarajan regarding NTCA member concerns related to the elimination of Lifeline voice support for many customers as for December 1, 2021, in the absence of action on pending petitions requesting relief from this policy. *See, e.g., Ex Parte* Letter from Michael R. Romano, Sr. Vice President, NTCA, to Marlene H. Dortch, Secretary, Federal Communications Commission (the “Commission”), WC Docket Nos. 11-42, 10-90, and 09-197 (filed Oct. 18, 2021). NTCA noted continuing pressures and required deadlines to provide customers with notices of anticipated rate increases in connection with the elimination of the subsidy, and also highlighted potential errors in the underlying data employed by Commission to determine where the subsidy should be eliminated or retained. Specifically, I observed that while the Commission had previously ruled that voice Lifeline support should be retained only in census blocks where there is one provider of Lifeline service, the fact that voice service data are collected on a *census tract* basis rather than a *census block* basis would appear to create significant possibility for “false positives.” More specifically, a Lifeline provider’s offering of voice service in just a single census block could result in every census block in *an entire census tract* looking “served” by multiple Lifeline providers – causing the elimination of Lifeline support for voice service where it should continue based upon nothing more than a lack of granular and accurate information. NTCA submitted this provided yet another reason to pause the elimination of the Lifeline voice subsidy and to revisit the policy as a whole before moving forward with it again.

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NTCA next discussed concerns with respect to the likelihood of recurring high-cost universal service fund (“USF”) budget control impacts on the efforts of small rural carriers to achieve their public interest deployment and performance obligations as defined in prior orders. Although the Commission thankfully provided relief from significant budget cuts to USF support in the spring of 2021, NTCA observed that such issues almost certainly will recur in 2022, especially as providers need to take even more steps to meet buildout requirements in the next few years. NTCA therefore expressed its interest in working with the Commission to address such issues before they reach emergency status yet again next spring, and urged the Commission as well to move forward with a rulemaking to consider enhancement and extension of ACAM support consistent with a petition submitted last year. See *Petition for Expedited Rulemaking of the ACAM Broadband Coalition*, RM No. 11868 (filed Oct. 30, 2020).

Finally, NTCA highlighted increasing concerns with respect to obtaining supplies for a variety of broadband-related efforts, including not only network deployment but also performance testing. NTCA members are reporting delays of up to 18 months for some supplies, and have received recent indications that some key pieces of equipment – including devices necessary for network performance testing under USF rules – still may not become available in sufficient quantities from vendors for placement in the required number of customer locations until sometime next year. NTCA looks forward to engaging with the Commission in the near future on how best to address these issues while ensuring reasonable accountability in the receipt and use of USF support.

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: Ramesh Nagarajan