



January 13, 2022

***Ex Parte Notice***

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

***RE: Report on the Future of Universal Service, WC Docket No. 21-476; Connect America Fund, WC Docket No. 10-90; Universal Service Contribution Methodology, WC Docket No. 06-122***

Dear Ms. Dortch:

On Wednesday, January 12, 2022, Shirley Bloomfield, Chief Executive Officer of NTCA–The Rural Broadband Association (“NTCA”), and the undersigned spoke with Commissioner Geoffrey Starks and Austin Bonner, his legal advisor for wireline and public safety.

NTCA first provided an update on the work of its members over the past year to deliver on the mission of universal service in rural America, providing insights from its [most recent member broadband survey](#). Among the points highlighted by NTCA were the efforts of members to connect, on average, 75% of their customers directly via fiber technology despite the deeply rural areas of the nature they serve and the fact that NTCA’s members typically have fewer than 30 employees; similarly, a comparable percentage of NTCA members’ customers on average have access to broadband exceeding 100 Mbps. NTCA also noted that these accomplishments – which far exceed the minimum kinds of service commitments expected by current universal service fund (“USF”) programs – typically depend upon an essential mix of entrepreneurial spirit, community commitment, private capital, loan and grant programs, and stable and predictable USF support.

At the same time, we observed that there is still work to be done in reaching some customers, 15% of whom on average remain served by copper loops and are unable to receive broadband at speeds higher than 10 Mbps. Moreover, we emphasized that even where robust networks are built and high-speed services are being delivered, the work of universal service is not done. To the contrary, universal service contemplates and mandates an ongoing effort to deliver services that are reasonably comparable in price and quality in rural and urban areas alike. NTCA therefore urges the Federal Communications Commission (the “Commission”) and other policymakers to avoid a narrow focus on “unserved” areas alone and to take account of where USF support is also needed to sustain networks and keep services affordable and at a level that keeps pace with evolving consumer demand. More specifically, NTCA expressed its strong support for Congress’ call for an examination of the “future of universal service” in the Infrastructure Act and for the Commission to take a holistic perspective in examining the distinct and unique role that the USF plays in enabling and sustaining access to broadband as compared to other programs focused narrowly on network construction alone.

Marlene H. Dortch  
January 13, 2022  
Page 2 of 2

NTCA also discussed the need to shore up and stabilize the eroding base of revenues that support the Commission's essential USF efforts. We discussed NTCA's interest in broadening the base of contributors as widely as possible to capture all of those that make use of or otherwise benefit from the widespread availability and affordability of broadband. We further noted the importance of the Commission undertaking now what steps it can pursuant to its existing authority to address these concerns, while simultaneously pursuing additional steps to improve further the long-term viability of the USF contribution mechanism and promote even greater equity among contributors.

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 Romano  
Michael Romano  
Senior Vice President – Industry Affairs and  
Business Development  
NTCA-The Rural Broadband Association

cc: Commissioner Geoffrey Starks  
Austin Bonner