



C O N S U L T I N G L L C

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May 18, 2022

Via E-Filing – Notice of Ex Parte Communications

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

**Re: Report on the Future of the Universal Service Fund, WC Docket No. 21-476;
Universal Service Contribution Methodology, WC Docket No. 06-122**

Dear Ms. Dortch:

On May 16, 2022 and May 17, 2022, the parties identified in Exhibit A met via separate video conference calls with the FCC Chairwoman’s staff, FCC Commissioners Carr, Starks, and their respective staffs, and Wireline Competition Bureau staff as further detailed in Exhibit A. We presented and discussed information in the slide deck submitted with this letter.

We highlighted the findings in the *USForward Report*, which was previously filed in the above-captioned dockets.¹ We noted that the Universal Service Fund (“USF”) is under significant duress because revenues subject to assessment have declined from \$68.1 billion in 2004 to \$29.1 billion in 2021, with no expectation that those trends will reverse; the contribution factor could reach 40% in just four years if action is not taken; and including broadband internet access service (“BIAS”) revenues in the contribution base would decrease the contribution factor to less than 4% and bring stabilization to the Fund.²

We noted that there is growing support for the FCC to utilize its existing statutory authority to reform the contribution methodology as recommended in the *USForward Report*. In February 2022, 332 entities representing a broad and diverse group of stakeholders, including public interest groups, communications companies, anchor institutions, and consumers collectively called on the Commission to take immediate action to reform and stabilize the USF by

¹ Letter from Carol Matthey, Matthey Consulting LLC, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket Nos. 21-476 and 06-122 (filed Feb. 14, 2022) (submitting Matthey Consulting, *FCC Must Reform USF Contributions Now: An Analysis of the Options* (Sept. 2021)) (“*USForward Report*”).

² We explained why Hal Singer’s estimate of the size of the USF pass-through charge was inflated because he chose not to include mobile broadband internet access service revenues in the calculation and assumed that the USF would double in size to \$17 billion.

expanding the contribution base to include BIAS.³ Since that filing, other interested stakeholders have agreed with the *USForward Report's* recommendation, including Broadband Connects America, Lumen, the National Tribal Telecommunications Association, NASUCA, NRECA, the New York State Public Service Commission, Twilio, the Vermont Department of Public Service, Windstream, and WISPA.⁴

We discussed how the *USForward Report* recommendation would be smart public policy, reduce regulatory uncertainty, better reflect evolving uses of services, be straightforward to administer, and be more equitable and nondiscriminatory for residential and business customers than the current system. Moreover, the Commission could make this change under its existing authority to assess providers of telecommunications—as it has previously, when it chose to assess interconnected Voice over Internet Protocol service—without requiring new legislation and independent of the classification of BIAS. The Commission exercised that authority in 1997 when it initially established the contribution methodology framework in the wake of the Telecommunications Act of 1996, requiring providers of private line service to contribute even though they are not common carriers.

Expanding the current revenues-based system to include BIAS will mitigate the incentives of providers to arbitrarily allocate revenues from bundled services to one service and not the other. It would not require the development of complicated and untested reporting regimes to implement as compared to other suggestions made for reform. Moreover, this modification would lower the current USF assessment on voice service, resulting in a more equitable contribution system. We noted that the most recent empirical study to examine the issue concluded that assessing BIAS would have no material impact on consumer broadband adoption or retention.⁵ Moreover, the Commission could prohibit the pass-through of USF contributions for Affordable Connectivity Program and Lifeline customers, as is done today for Lifeline customers of incumbent telecommunications carriers.

We asserted that given the urgency of the USF contribution crisis, the Commission should not wait for Congressional action. Rather, the Commission should exercise its existing statutory authority to expand the contribution base now. Any changes to the contribution methodology will take time to implement, once adopted, and the Commission cannot afford to wait. We urged the Commission to support the *USForward* recommendation and to take immediate steps to

³ See Letter from Carol E. Matthey, Matthey Consulting LLC, to Marlene H. Dortch, Secretary of the Federal Communications Commission, WC Docket Nos. 21-476 & 06-122 (Feb. 14, 2022) (submitting *USForward Report* and Call to Action with 332 signatories stating that there should be “immediate action to reform and stabilize the funding mechanism that supports the USF by expanding the list of services that pay into it to include broadband internet access services (BIAS)”).

⁴ Comments of Broadband Connects America, at 4; Comments of Lumen, at 7-8; Comments of the National Tribal Telecommunications Association, at 15; Comments of the National Association of State Utility Consumer Advocates (“NASUCA”), at 9-10; Comments of the National Rural Electric Cooperative Association (“NRECA”), at 12; Comments of the New York State Public Service Commission, at 3; Reply Comments of Twilio, at 3-4; Comments of the Vermont Department of Public Service, at 2-5; Reply Comments of Windstream, at 2; and Comments of the Wireless Internet Service Providers Association (“WISPA”), at 28-29.

⁵ See Letter from Michael R. Romano, Senior Vice President, NTCA – The Rural Broadband Association, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 06-122 (filed May 11, 2020) (submitting a report prepared by the Berkeley Research Group, *NTCA-USF Study, Expert Report of Michael A. Williams and Wei Zhao* (May 7, 2020), that found a modest USF assessment on broadband service would have no material impact on broadband adoption and retention).

reform the contribution methodology to ensure that the USF is sustainable so it can continue to promote and enable the availability and affordability of communications networks and services for rural and low-income consumers, schools, libraries, and rural health care providers.⁶

Please do not hesitate to contact the undersigned if there are questions regarding this submission.

Respectfully submitted,

/s/

Carol E. Matthey
Principal
Matthey Consulting, LLC

Attachments

cc: Commissioner Carr
Commissioner Starks
Priscilla Delgado Argeris
Ramesh Nagarajan
Greg Watson
Justin Faulb
Morgan Bodenaarain
Trent Harkrader
Terri Natoli
Jodie Griffin
Karen Sprung
Charles Eberle

⁶ We also noted that to the extent the Commission believes it should refresh the record, the Wireline Competition Bureau could issue a Public Notice to seek comment on the *USForward* recommendation, as has been done in the past in other dockets where there is a pending open rulemaking and a specific proposal filed in the record.

EXHIBIT A: Meeting Attendees

Meeting with the Office of Commissioner Brendan Carr on May 16, 2022:

- Commissioner Brendan Carr
- Greg Watson, Policy Advisor to Commissioner Carr
- Andrew Brown and Susan Gately, Ad Hoc Telecom Users Committee
- Angie Kronenberg and Lindsay Stern, INCOMPAS
- Carol Matthey, Matthey Consulting
- Greg Guice, Public Knowledge
- Glenn Richards, Voice on the Net Coalition

Meeting with the Office of Chairwoman Jessica Rosenworcel on May 16, 2022:

- Priscilla Delgado Argeris, Chief Legal Advisor to Chairwoman
- Ramesh Nagarajan, Wireline Legal Advisor to Chairwoman
- Andrew Brown and Susan Gately, Ad Hoc Telecom Users Committee
- Angie Kronenberg and Lindsay Stern, INCOMPAS
- Carol Matthey, Matthey Consulting
- Michael Romano, NTCA – The Rural Broadband Association
- Greg Guice, Public Knowledge
- John Windhausen, Schools, Health & Libraries Broadband (“SHLB”) Coalition
- Glenn Richards, Voice on the Net Coalition

Meeting with the Wireline Competition Bureau on May 16, 2022:

- Trent Harkrader, Bureau Chief
- Terri Natoli, Associate Bureau Chief
- Jodie Griffin, Division Chief of Telecommunications Access Policy Division (TAPD)
- Karen Sprung, Deputy Division Chief of TAPD
- Charles Eberle, Assistant Division Chief of TAPD
- Andrew Brown and Susan Gately, Ad Hoc Telecom Users Committee
- Angie Kronenberg and Lindsay Stern, INCOMPAS
- Carol Matthey, Matthey Consulting
- Michael Romano, NTCA – The Rural Broadband Association
- Greg Guice, Public Knowledge
- John Windhausen, Schools, Health & Libraries Broadband (“SHLB”) Coalition
- Glenn Richards, Voice on the Net Coalition

Meeting with the Office of Commissioner Geoffrey Starks on May 17, 2022:

- Commissioner Geoffrey Starks
- Justin Faulb, Legal Advisor for Wireline and National Security to Commissioner Starks
- Morgan Bodenaarain, Legal Advisor to Commissioner Starks
- Andrew Brown and Susan Gately, Ad Hoc Telecom Users Committee
- Angie Kronenberg and Lindsay Stern, INCOMPAS

- Carol Matthey, Matthey Consulting
- Michael Romano, NTCA – The Rural Broadband Association
- Greg Guice, Public Knowledge
- John Windhausen, Schools, Health & Libraries Broadband (“SHLB”) Coalition
- Glenn Richards, Voice on the Net Coalition

Universal Service Fund Contributions Reform

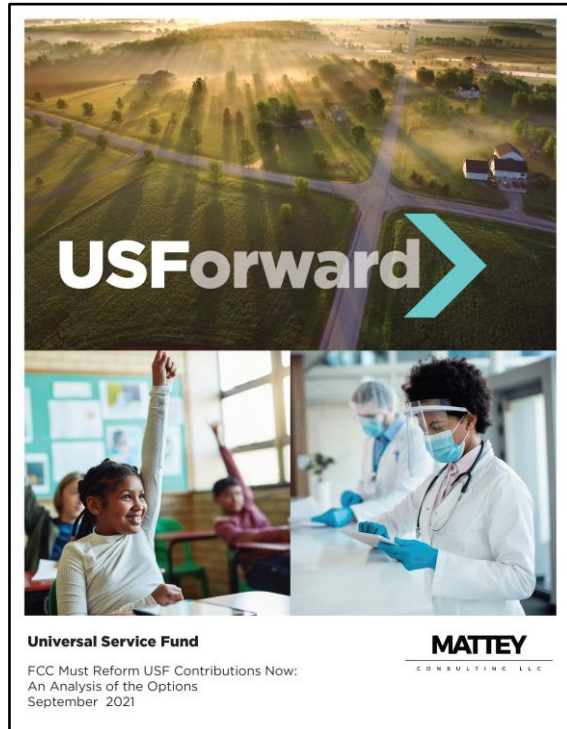


TABLE 1. SUMMARY OF SERVICES THAT DO AND DO NOT CONTRIBUTE

Today's USF contribution base

ASSESSED	NOT ASSESSED
Voice, including mobile voice and interconnected VoIP	Broadband internet access service
Access to interexchange service	Wireless data, texting
Customer charges such as Universal Service Fee, Subscriber Line Charge and Access Recovery Charge	One-way VoIP
Cellular telephone, mobile radio, personal communications services	Intrastate services
Paging	Cable video
Dispatch and operator services	Direct Broadcast Satellite (DBS) video
Business data services/special access/private line service ¹⁰	
Wide area telecommunications services (WATS)	
Toll-free services	
900 services	
Telex, telegraph	
Video services (i.e., telecommunications services that deliver video signals to cable head-ends)	
Satellite services (i.e., space segment and earth station link-up for those who provide telecommunications service via satellite)	
Resale of interstate services	
Audio bridging services	
Payphone services	
Prepaid calling cards	

- Service providers contribute, based on their interstate and international telecommunications service revenues
- Assessment rate – known as the contribution factor – set quarterly based on projected disbursements and projected demand for the upcoming quarter
- Voice service revenues (including VoIP) is assessed; broadband internet access service revenues are not assessed

Myth

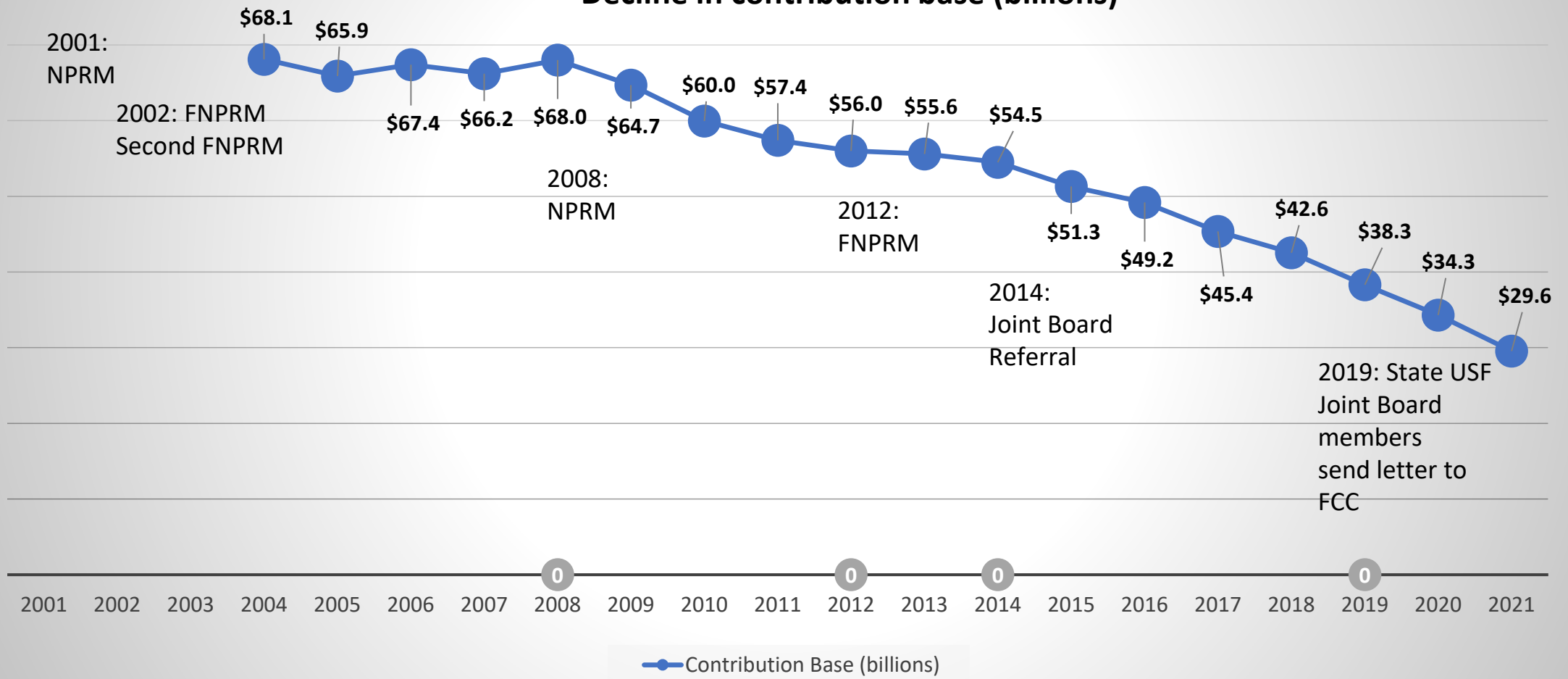
USF IS FUNDED BY A TAX ON OLD FASHIONED LANDLINE TELEPHONES.

Reality

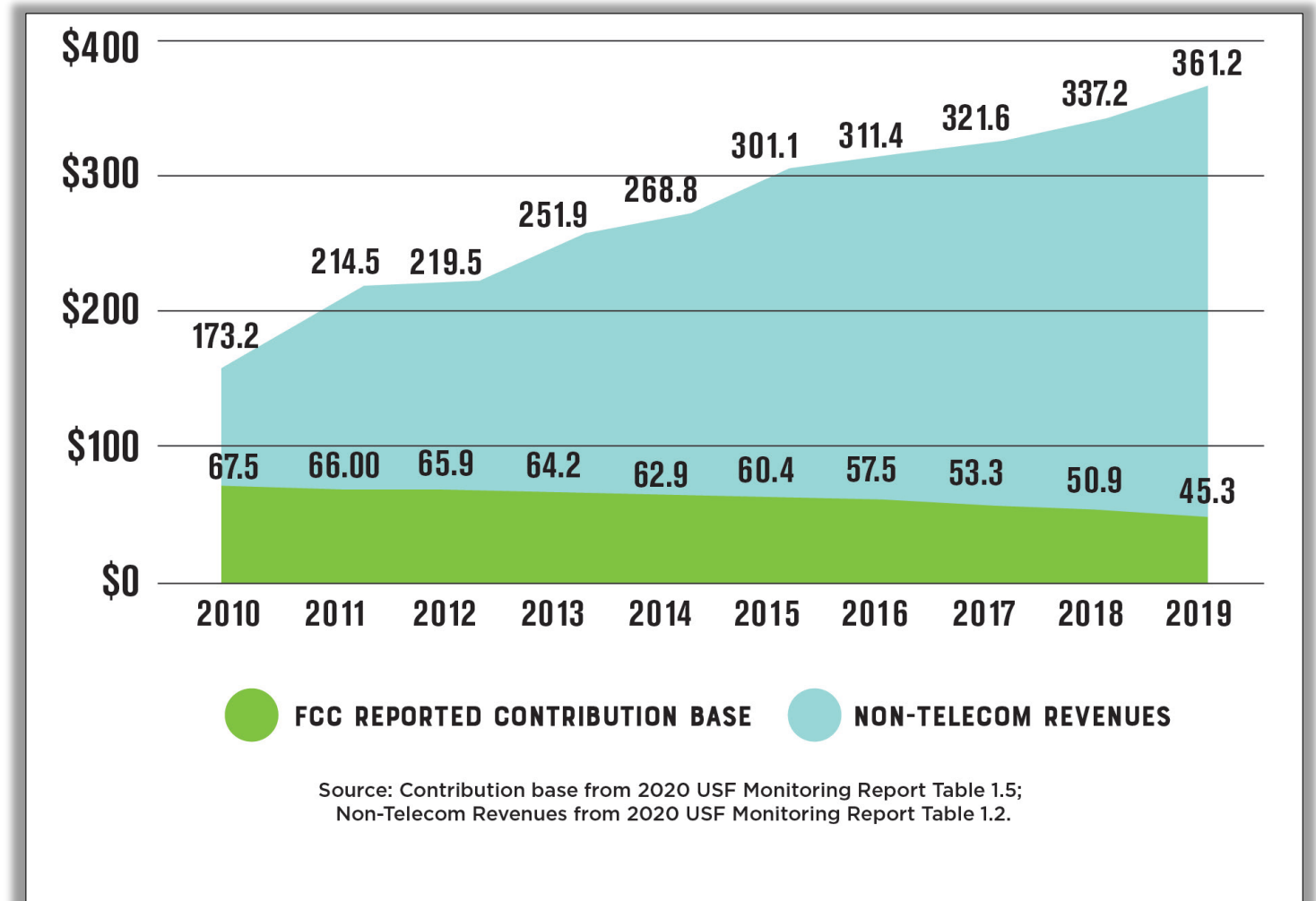
MOBILE OPERATORS AND VOIP PROVIDERS CONTRIBUTE TO USF AS WELL.

History of USF Contributions Reform

Decline in contribution base (billions)

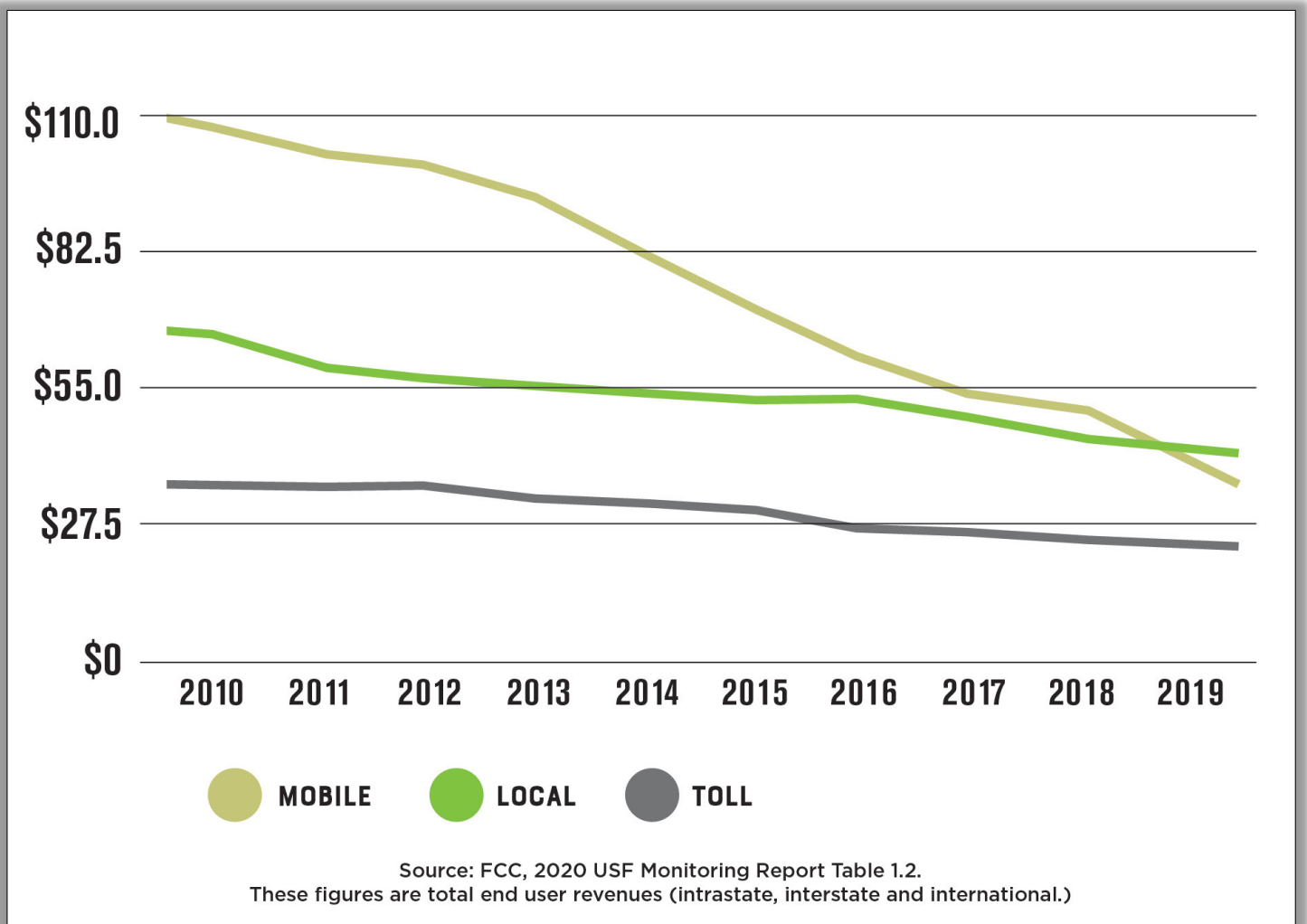


The Problem: Declining Assessable Revenues



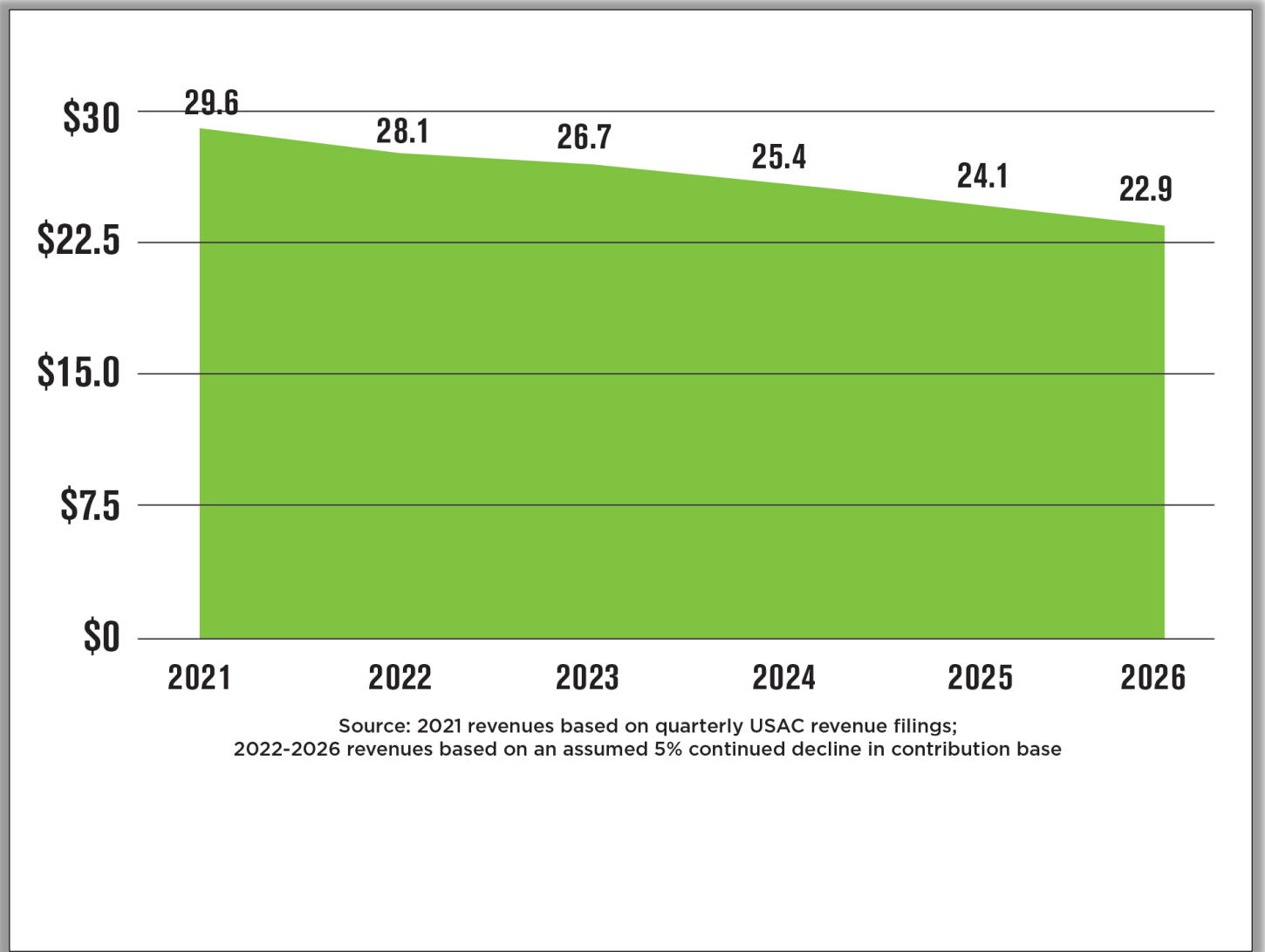
* Non-telecommunications revenues reported to the FCC include information services, inside wiring maintenance, billing and collection, customer premise equipment, published directories, dark fiber, internet access, cable TV program transmission, and foreign carrier operations

The Cause

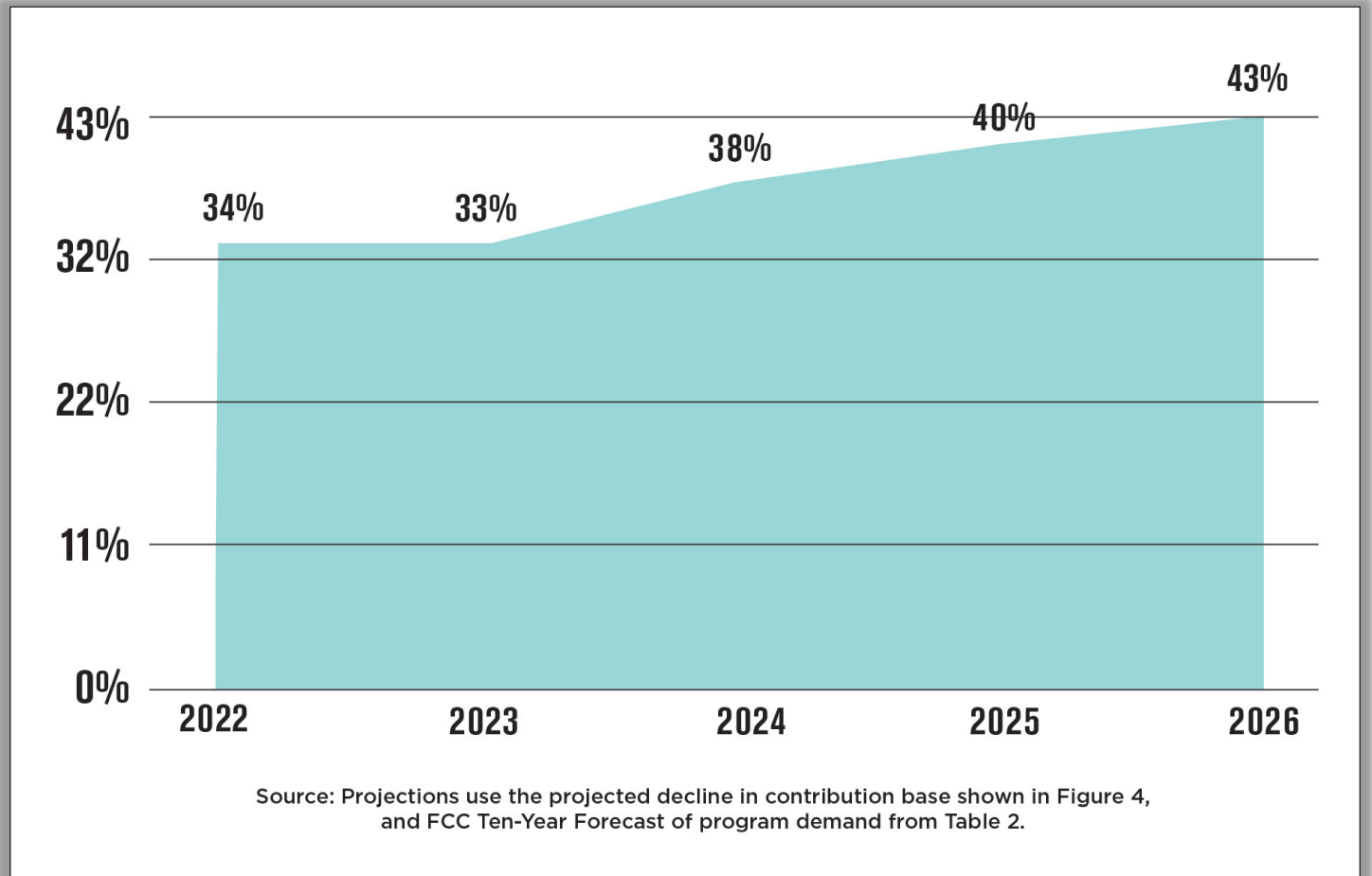


The Trend

USF assessable revenues are projected to continue to decline



The Effect



* The USForward Report projected the contribution factor under the status quo, using the FY 2022 Budget FCC Ten-Year forecast of USF program demand. The more recent FY 2023 Budget projects lower amounts for USF program demand.

But Hasn't the Factor Gone Down Recently?

The factor declined in recent quarters because demand in a few USF programs – high-cost and rural healthcare – dropped

But these drops were temporary, related to the timing and distribution of new awards of funding in these programs

The trend projected on the prior slide remains clear – the factor will increase again. In fact, the third quarter factor will be 29.1%

Options for action that the FCC could take within its existing authority

FCC has sought comment multiple times in the last two decades on three primary proposals:

- BIAS revenues
- Flat fee per connection, both voice and broadband
- Flat fee per phone number

USForward Report Recommendation:

Expand the current contribution base by assessing BIAS revenues

How to Fix the Problem

Include broadband internet access service (BIAS) revenues in the contributions base

Doing so would be:

- **Smart** – it's common sense to use BIAS revenues to fund programs that support broadband access
- **Stable** – BIAS revenues are expected to remain stable with potential for modest growth
- **Fast** – the FCC has authority to act, and this reform can be implemented more quickly than alternatives
- **Transparent** – assessing BIAS revenues provides greater assurance of accuracy than alternatives considered by the FCC (e.g., assessing connections) and mitigates gamesmanship
- **Equitable** – those bearing contribution obligations today aren't the most significant users of networks and services

The Outcome

	2021	2022	2023	2024
USF DEMAND (BILLIONS)	\$9.7	\$9.6	\$8.9	\$9.6
TOTAL REVENUE (BILLIONS)	\$255.2	\$266.9	\$276.7	\$286.0
TELECOM REVENUE	\$29.6	\$28.1	\$26.7	\$25.4
BROADBAND REVENUE	\$225.6	\$238.8	\$250.0	\$260.6
CONTRIBUTION FACTOR	3.8%	3.6%	3.2%	3.4%

Source: FCC Ten-Year Forecast of program demand from Table 2; estimated telecom revenues from Figure 4; estimated broadband revenues from Table 5; assumes the full amount of end user retail broadband revenues would be assessable, and that broadband internet access service is a wholly interstate service, so that all retail revenues would be subject to federal USF.

* USForward Report used FY 2022 Budget FCC's Ten-Year Forecast of USF Demand. The more recent FY 2023 FCC budget indicates that actual USF demand in FY 2021 was \$8.7b; FY 2022 demand projected to be \$8.5b; FY 2023 projected to be \$8.3b.



The [USForward Report](#) (released in September 2021) provides more details on reform needs and fixes



In a February 2022 [“Call to Action,”](#) 332 stakeholders urged the FCC to stabilize the contribution base by assessing broadband internet access revenues

Public Interest Organizations

California Emerging Technology Fund, Concord, CA
California IT in Education (CITE), Sacramento, CA
Communication Workers of America, Washington, DC
Gigabit Libraries Network, Sausalito, CA
National Digital Inclusion Alliance, Columbus, OH
Public Knowledge, Washington, DC
Schools, Health & Libraries Broadband (SHLB) Coalition, Washington, DC

Residential and Business Consumer Organizations

2600Hz, San Francisco, CA
Ad Hoc Telecom Users Committee
Telecom Training Corporation, Nashville, TN

Trade Associations

Alaska Telecom Association, Anchorage, AK
Albany Mutual Telephone Association, Albany, MN
American Library Association, Chicago, IL
Association of TeleServices International (ATSI), Saint Paul, MN
Broadband Association of North Dakota, Mandan, ND
Chamber of Progress, Washington, DC
Cloud Communications Alliance, Delray Beach, FL
Colorado Hospital Association, Greenwood Village, CO
Colorado Telecommunications Association, Denver, CO
Communications Coalition of Kansas, Topeka, KS
CoSN, the Consortium for School Networking, Washington, DC
Iowa Communications Alliance, West Des Moines, IA
INCOMPAS, Washington, DC
Indiana Rural Broadband Association, Rochester, IN
Information Technology Industry Council (ITI), Washington, DC
Kentucky Telecom Association, Frankfort, KY
Minnesota Telecom Alliance, St. Paul, MN
Montana Telecom Association, Helena, MT
NTCA – The Rural Broadband Association, Arlington, VA
Rural Wireless Association, Washington, DC
South Carolina Telephone and Broadband Association, Columbia, SC
South Dakota Telecommunication Association, Pierre, SD
Telecommunications Association of Maine, New Gloucester, ME
Tennessee Broadband Association, McMinnville, TN
Texas Telephone Association, Austin, TX
Urban Libraries Council, Washington, DC
Utah Library Association, Salt Lake City, UT
Utah Rural Telecom Association, Salt Lake City, UT
Voice on the Net Coalition, Washington, DC
Wisconsin State Telecommunications Association, Madison, WI
WTA – Advocates for Rural Broadband, Washington, DC

Anchor Institutions (Schools, Libraries, Healthcare Providers, etc.)

Alaska State Library, Juneau, AK
Asbury Park Free Public Library, Asbury Park, NJ
Asotin County Library, Clarkston, WA
Chief Officers of State Library Agencies (COSLA), Lexington, KY
Connections Telehealth Consortium, Bangor, ME
Fresno Unified School District, Fresno, CA
Friday Institute for Educational Innovation, Raleigh, NC
High Desert Education Service District, Redmond, OR
Imperial County Office of Education, El Centro, CA
Kansas City Public Library, Kansas City, MO
New England Telehealth Consortium, Bangor, ME
San Jose State University School of Information, San Jose, CA
Steamboat Springs School District, Steamboat Springs, CO
Utah State Library Division, Salt Lake City, UT
Washington State Library, Olympia, WA
Westchester Library System, Elmsford, NY

Broadband Service Providers

3 Rivers Communications, Fairfield, MT
Alaska Telephone Company, Bettles Telephone, Inc. and North Country Telephone, Inc., Wasilla, AK
Alenco Communications, Inc., Joshua, TX
Alliance Communications, Garretson, SD
Allstream Business US, LLC, Vancouver, WA
Amery Telcom, Amery, WI
Arctic Slope Telephone Association Cooperative, Inc., Anchorage, AK
ATC Communications, Albion, ID
Baca Valley Telephone Co., Inc., Des Moines, NM
Ballard Rural Telephone Cooperative Corporation, Inc., La Center, KY
BBT, Alpine, TX
Beehive Telephone Co., Inc., Nevada, Lake Point, UT
BEK Communications Cooperative, Steele, ND
Ben Lomand Connect, McMinnville, TN
Benkelman Telephone Company, Wauneta Telephone Company, Hartman Telephone Exchanges, Inc., Benkelman, Nebraska
Benton Cooperative Tel Co, Rice, MN
Beresford Municipal Telephone Company, Beresford, SD
Bloomingdale Communications, Inc., Bloomingdale, MI
Blue Valley Tele-Communications, Inc., Home, KS
BPS Telephone, Bernie, MO
Bulloch County Rural Telephone Cooperative, Inc., Statesboro, GA
Cap Rock Telephone Cooperative, Inc., Spur, TX
Cascade Communications Company, Cascade, IA
Central Arkansas Telephone Cooperative, Inc., Bismarck, AR
Central Oklahoma Telephone Co., L.L.C., Davenport, OK
Chequamegon Communications Cooperative dba. Norvado, Cable, WI
Cheyenne River Sioux Tribe Telephone Authority, Eagle Butte, SD
Christensen Communications Company, Madelia, MN
Citizens Mutual Telephone Cooperative, Bloomfield, IA

Citizens Telephone Cooperative, Inc. DBA: Citizens Connected, New Auburn, WI
Citizens Telephone Corporation, Warren, IN
City of Ketchikan, KPU Telecommunications, Ketchikan, AK
Clay County Rural Telephone Cooperative/Endeavor Communications, Indiana
Clear Lake Independent Telephone Company, Clear Lake, IA
Coleman County Telephone Cooperative Inc., Santa Anna, TX
Colorado Valley Telephone Cooperative, Inc., La Grange, TX
Community Telephone Company, Windthorst, TX
Consolidated Companies, Lincoln, NE
Consolidated Telcom, Dickinson, ND
Cooperative Telephone Company, Victor, IA
Copper Valley Telecom & Copper Valley Wireless, Valdez, AK
Craigville Telephone Company, Inc., Craigville, IN
CTC, Brainerd, MN
Cunningham Telephone Company, Inc., Glen Elder, KS
Custer Telephone Cooperative Inc., Challis, ID
Danville Mutual Telephone Company, Danville, IA
Diller Telephone Company, Diller, NE
Direct Communications/Star Telephone, Rockland, ID
DTC Communications, Alexandria, TN
Dumont Telephone Company, Dumont, IA
East Buchanan Telephone Cooperative, Winthrop, IA
Ellington Telephone Co, Ellington, MO
Emily Cooperative Telephone Company, Emily, MN
F&B Communications, Wheatland, IA
Farmers Independent Telephone Company, Grantsburg, WI
Farmers Mutual Communications, Moulton IA
Farmers Mutual Telephone Company, Fruitland, ID
Farmers Telecommunications, Rainsville, AL
Farmers Telephone Cooperative, Inc., Kingstree, SC
Federated Telephone Cooperative, Chokio, MN
Fenton Cooperative Telephone Company, Fenton, IA
Filer Mutual Telephone Company, DBA TruLeap Technologies, Filer, ID
Five Area Telephone, Muleshoe, TX
Foothills Rural Telephone Cooperative Corp Inc, Staffordsville, KY
Garden Valley Technologies, Erskine, MN
GBT-Golden Belt Telephone Association Inc., Rush Center, KS
Geetingsville Telephone Company, Inc., Geetingsville, IN
Glenwood Telephone Membership Corporation, Blue Hill, NE
Golden West Telecommunications, Wall, SD
Gorham Telephone Company, Gorham, KS
Granite State Communications, Weare, NH
Granite Telecommunications, LLC, Quincy, MA
Great Plains Communications, Blair, NE
Green Hills Communications, Breckenridge, MO

GRM Networks, Princeton, MO
H&B Communications, Holyrood, KS
Hardy Telecommunications, Inc., Lost River, WV
Harrisonville Telephone Company, Waterloo, IL
Hart Telephone Company, Hartwell, GA
Heart of Iowa Communications Cooperative, Union, IA
Hemingford Coop Telephone Co., Hemingford, NE
Hill Country Telephone Cooperative, Inc. (HCTC), Ingram, TX
Home Telephone Co., Saint Jacob, IL
Hubbard Cooperative Telephone Association, Colo, IA
Huxley Communications Cooperative, Huxley, IA
Interactive Services Network, Inc DBA IPFone, North Miami, FL
InterBel Telephone Cooperative, Eureka, MT
Interstate Telecommunications Cooperative, Inc., Clear Lake, SD
ITS Telecommunications Systems, Inc., Indiantown, FL
Kalida Telephone Co., Kaalida, OH
Kalona Cooperative Technology Company, Kalona, IA
KanOkla Networks, Caldwell, KS
KanREN, Inc., Lawrence, KS
Kennebec Telephone Co., Inc., Kennebec, SD
Kerman Telephone Co / Foresthill Telephone Co. (dba Sebastian), Kerman, CA
Kingdom Telephone Company, Auxvasse, MO
KMTelecom, Kasson, MN
Lakeland Communications, Milltown, WI
La Ward Telephone Exchange, Inc., La Ward, TX
Lehigh Valley Coop Telephone Association, Lehigh, IA
Lennon Telephone Company, Lennon, MI
LightStream, Buffalo, IN
Lincoln Telephone Company, Inc., Lincoln, MT
Link Oregon, Portland, OR
Logic Networks, Tampa, FL
Lone Rock Cooperative Telephone Company, Lone Rock, IA
Loretto Telecom, Loretto, TN
Lost Nation-Elwood Telephone Company, Lost Nation, IA
LTC Connect, Auburn, KY
Lumos/NorthState, Waynesboro, VA
Lynxx Networks, Camp Douglas, WI
Madison Telephone, LLC, Madison, KS
Mainstay Communications, Henderson, NE
Marne & Elk Horn Telephone Company, Elk Horn, IA
Matanuska Telecom Association, Inc., Palmer, AK
McDonough Telephone Cooperative, Colchester, IL
MCNC, Research Triangle Park, NC
Midstate Communications, Kimball, SD
Minburn Communications, Woodward, IA

MissouriCom, Seneca Telephone, Ozark Telephone, Goodman Telephone, ARK-O
 Holdings, New Florence, MO and Seneca, MO
 Mobile Citizen, Boulder, CO
 Monon Telephone Company Inc., Monon, IN
 Mosaic Technologies, Cameron, WI
 NCC, Ray, ND
 NC Telehealth Network Association, Concord, NC
 Nelson Communications Cooperative, Durand, WI
 NEMR Telecom, Green City, MO
 New Lisbon Telephone Company and Pennsylvania Telephone Company, New Lisbon,
 IN
 Newport Telephone Company, Inc., Newport, NY
 NineStar Connect, Greenfield, IN
 Nortex Communications, Muenster, TX
 North Central Telephone Cooperative, Inc., Lafayette, TN
 North Texas Telephone Company, Byers, TX
 Nsight Telservices, Green Bay, WI
 Oklatel Communications, Dustin, OK
 Oneida Telephone Exchange, Oneida, IL
 Oran Mutual Telephone Co, Oran, IA
 Oregon Telephone Corporation, Mt Vernon, OR
 OTZ Telephone Cooperative, Kotzebue, AK
 Palmer Mutual Telephone Company, Palmer, IA
 Palmetto Rural Telephone Cooperative, Inc., Walterboro, SC
 Panora Communications Cooperative, Panora, IA
 Park Region, Underwood, MN
 Paul Bunyan Communications, Bemidji, MN
 PC Telcom, Holyoke, CO
 Penasco Valley Telephone Cooperative, Inc., Artesia, NM
 Peoples Rural Telephone Cooperative, McKee, KY
 Perry-Spencer Rural Telephone Cooperative d/b/a PSC, St. Meinrad, IN
 Piedmont Rural Telephone Cooperative, Laurens, SC
 Pine Belt Telephone & Wireless, Arlington, AL
 Pineland Telephone Cooperative, Inc., Metter, GA
 Pioneer Communications, Ulysses, KS
 Pioneer Telephone Company, LaCrosse, WA
 Pioneer Telephone Cooperative dba Pioneer Connect, Philomath, OR
 Plainview Telephone Company, Plainview, NE
 Planters Rural Telephone Cooperative, Newington, GA
 Poka Lambro Telephone Cooperative, Wilson, TX
 Polar Communications Mutual Aid Corp, Park River, ND
 Ponderosa Telephone; Table Top Telephone, O'Neals, CA; Ajo, AZ
 Prairie Grove Telephone Company, Prairie Grove, AK
 Premier Communications, Sioux Center, IA

PTCI, Guymon, OK
 Rainbow Communications, Everest, KS
 Randolph Telephone Membership Corporation, Asheboro, NC
 Range, Forsyth, MT
 RC Technologies, New Effington, SD
 Readlyn Telephone Company (dba RTC Communications), Readlyn, IA
 Ridgeville Telephone Company, Ridgeville Corners, OH
 River Valley Telecommunications Coop, Graettinger, IA
 Rochester Telephone Company, Rochester, IN
 Roggen Telephone Cooperative Company, Roggen, CO
 Runestone Telecom Association, Hoffman, MN
 S&T Telephone Association, Brewster, KS
 Sacred Wind Communications, Inc, Yatahey, NM
 Sandhill Telephone Cooperative, Jefferson, SC
 Santa Rosa Telephone Cooperative, Vernon, TX
 Santel Communications Cooperative, Woonsocket, SD
 SCTC, Stayton, OR
 SEI Communications, Dillsboro, IN
 Shawnee Communications, Equality, IL
 Siskiyou Telephone Company, Etna, CA
 SkyLine Membership Corporation, West Jefferson, NC
 Solarus, Wisconsin Rapids, WI
 South Central Telephone Association, Inc (KS & OK), Medicine Lodge, KS
 South Plains Telephone Cooperative, Inc, Lubbock, TX
 South Slope Cooperative Communications Company, North Liberty, IA
 Southeast Nebraska Communications, Inc., Falls City, NE
 Southern Montana Telephone, Wisdom, MT
 Southwest Texas Communications, Rocksprings, TX
 Springport Telephone Company, Springport, MI
 SRT Communications, Inc., Minot, ND
 STRATA Networks, Roosevelt, UT
 Sun Corridor Network, Tucson, AZ
 TDS Telecom, Madison, WI
 Telephone Service Company, Wapakoneta, OH
 Templeton Telephone Company, Templeton, IA
 Texoma Communications, LLC dba TekWav, Sherman, TX
 Thacker-Grigsby Communications, Hindman, KY
 Three River Telco, Lynch, NE
 Tohono O'odham Utility Authority, Sells, AZ
 Totelcom Communications LLC, De Leon, TX
 Triangle Communications, Havre, MT
 Tri-County Communications Cooperative, Inc., Strum, WI
 Trilogy 5G, Inc., Irving, TX
 TrioTel Communications, Inc., Salem, SD

Twin Lakes Telephone Cooperative, Gainesboro, TN
Twin Valley Telephone & Southern Kansas Telephone, Miltonvale, KS
United Communications, Langdon, ND
UniTel, Inc., Unity, ME
Upsala Cooperative Telephone Assn., Upsala, MN
USConnect, Bedford, NH
Valley Telephone Cooperative, Inc., Raymondville, TX
Valley Telephone Cooperative, Inc., Willcox, AZ
Venture Communications Cooperative, Highmore, SD
Viola Home Telephone Company, Viola, IL
Voqal, Boulder, CO
Wabash Communications CO-OP, Louisville, IL
Wahkiakum West Telephone Co., Rosburg, WA
Waitsfield and Champlain Valley Telecom, Waitsfield, VT
WANRack, Overland Park, KS
Webster-Calhoun Cooperative Telephone Association, Gowrie, IA
Wellman Cooperative Telephone Association, Wellman, IA
West Carolina Rural Telephone Cooperative, Abbeville, SC
West Central Telephone Association, Sebeka MN
West Wisconsin Telcom, Co-op, Inc., Downsville, WI
Western Iowa Networks, Breda, IA
Western Iowa Telecommunications, Lawton, IA
Wes-Tex Telephone Cooperative, Inc., Stanton, TX
Wheat State Technologies, Udall, KS
Wiggins Telephone Association, d/b/a Blue Lightning, Wiggins, CO
Wilkes Communications / RiverStreet Networks, Wilkesboro, NC
Wittenberg Telephone Company, Wittenberg, WI
WTC, Wamego, KS
YK Communications, Ganado, TX

Others

ADS Advanced Data Services, Inc., Mount Pleasant, TX
AdTec, Centerville, Indiana
Arizona Department of Education, Phoenix, AZ
Alianza, Pleasant Grove, UT
Bandwidth Inc., Raleigh, NC
Channelford Associates Inc., Westlake Village, CA
Autry, Hall & Cook, LLP, Atlanta, GA
Digital Wish, Milton, DE
BluIP, Inc., Las Vegas, NV
BT Americas, United Kingdom
Educational Professional Services, Pine Grove, LA
Epic Communications, Solon, OH

E-Rate Central, Westbury, NY
E-Rate Online LLC, Orange, CT
Espy Services, Inc., Bedford, IN
CRW Consulting, Tulsa, OK
E-rate Services, LLC, Sanford, NC
Healthcare Funding Connection, Prospect, KY
Educational Professional Services, Pine Grove, LA
Infinity Communications & Consulting Inc., Bakersfield, CA
E-Rate and Educational Services, LLC, Rapid City, SD
Janice Meyers Educational Consulting, LLC, Mount Pleasant, SC
Kellogg & Sovereign Consulting, San Antonio, TX
EveryLibrary Institute NFP, Berwyn, IL
Funds For Learning, Edmond, OK
HealthConnect Networks, Bangor, ME
Heartland Consulting, Mitchell, SD
Heberly & Associates, Havre, MT
Los Angeles County Office of Education, Los Angeles, CA
Lucky Thirteen Design and Consulting, LLC, Berkeley, CA
Mattey Consulting LLC, Bethesda, MD
SpectraCorp Technologies Group Inc., Dallas, TX
State Educational Technology Directors Association (SETDA), Glen Burnie, MD
TCA, Inc. - Telcom Consulting Associates, Colorado Springs, CO
Telcom Insurance Group, Wichita, KS
Telconnections, Inc., Little Rock, AR
TelNet Worldwide, Clinton Township, MI
Utah Broadband Center, Governor's Office of Economic Opportunity, Salt Lake City, Utah
Van Hoet & Company, Chartered, Olathe, KS
VST Services, LP, Trophy Club, TX
Western New York Rural Area Health Education Center (WNY R-AHEC), Warsaw, NY

Support for USForward is Growing

Additional Organizations and Companies that have since shown support in filings to the FCC:

- Broadband Connects America
- Lumen
- National Tribal Telecommunications Association
- NASUCA
- NRECA
- New York State PSC
- Twilio
- Vermont Department of Public Service
- Windstream
- WISPA

But Won't
This Cause
Customers to
Drop
Broadband
Service?

The most recent empirical study to examine this issue specifically found that assessing broadband would have no material impact on broadband adoption or retention

Protecting the most price-sensitive customers will be important, but it's not a reason to decline such reform altogether

Does the FCC Have Authority to Do This?

Congress gave the FCC permissive authority to include services that provide interstate “telecommunications” within the contribution base

The FCC has used this authority previously to assess interconnected VoIP, which it has not classified as a telecom service but recognizes provides telecommunications

Broadband internet access services can therefore be included within the contribution base regardless of regulatory classification

Where We're
Headed –
and Where
We Need To
Head

	Contribution Factor	
	Status Quo	Expand the Base to Include BIAS
2022	30%	3.2%
2023	32%	3.0%
2024	33%	2.9%