



March 20, 2023

***Ex Parte Notice***

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

**RE: *Connect America Fund, WC Docket No. 10-90; ETC Annual Reports and Certifications, WC Docket No. 14-58; Telecommunications Carriers Eligible to Receive Universal Service Support, WC Docket No. 09-197; Connect America Fund – Alaska Plan, WC Docket No. 16-271; Expanding Broadband Service Through the A-CAM Program, RM-11868***

Dear Ms. Dortch:

On Thursday, March 16, 2023, the undersigned on behalf of NTCA–The Rural Broadband Association (“NTCA”) spoke with Suzanne Yelen of the Wireline Competition Bureau regarding matters in the above-referenced proceedings. During this discussion, I urged the Federal Communications Commission (the “Commission”) to adopt updates and enhancements to the Alternative Connect America Model (“ACAM”) and the Connect America Fund-Broadband Loop Support (“CAF-BLS”) and High-Cost Loop Support (“HCLS”) mechanisms consistent with prior proposals. *See* Comments of NTCA, WC Docket No. 10-90, *et al.* (filed July 18, 2022); Reply Comments of NTCA, WC Docket No. 10-90, *et al.* (filed Aug. 1, 2022); *Ex Parte* Letters from Michael R. Romano, Executive Vice President, NTCA, to Marlene H. Dortch, Secretary, Commission, WC Docket No. 10-90, *et al.* (filed Oct. 14, 2022, and Dec. 5, 2022).

With respect to ACAM, I noted the essential interplay of support levels, support terms, and levels of service commitment in adopting and implementing reforms, and observed the need for proposals to strike the right balance in achieving the goals of delivering better broadband to rural consumers in the near future in an effective and efficient manner. With respect to CAF-BLS and HCLS, I expressed concerns about a recurrence of the budget control mechanism (“BCM”) that, if implemented, would result in substantial cuts in support for several hundred small rural providers, put at risk the viability of prior investments in existing high-capacity networks, and undermine the ability for small providers to expand and offer quality services on an ongoing basis at more affordable rates to consumers across rural America. While the Commission could grant a BCM waiver for the year ahead – and while such relief would be justified for the very same reasons as prior BCM waivers were granted – the recurring nature of this issue and the ongoing factors driving it confirm that fundamental recalibration of the 2018 BCM as has been proposed by NTCA is warranted and appropriate, and the measures previously recommended by NTCA would put these programs on more sound footing and on a clear path to enable the delivery of higher-speed broadband on a sustainable basis across broad rural geographies.

Marlene H. Dortch

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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 Romano

Michael Romano

Executive Vice President

cc: Suzanne Yelen