



June 28, 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 Tuesday, June 27, 2023, the undersigned on behalf of NTCA-The Rural Broadband Association (“NTCA”) spoke with Elizabeth Cuttner, legal advisor to Chairwoman Jessica Rosenworcel, regarding matters in the above-referenced proceedings.

During the conversation, NTCA reiterated support for targeting sufficient funds to enable network deployment so that providers can make the substantial efforts still needed to reach the remaining unserved locations in their areas. At the same time, NTCA urged the Federal Communications Commission (the “Commission”) to recognize expressly the importance of providing reasonable and sufficient ongoing support for locations that are currently served to ensure rates remain affordable and prior loans and private investment capital can be repaid and recovered. NTCA further observed that the Commission’s model identifies the level of such expenses to support, and that merely stretching the same amount of support over a prolonged period, for example, would be insufficient cost recovery. NTCA therefore encouraged the Commission to seek in any order to strike a balance between directing resources very much needed to promote new deployments and meeting the broader mission of universal service, by defining reasonable potential parameters for both objectives that can be used in finalizing enhanced model offers.

NTCA further asked the Commission to ensure that, prior to adjusting support due to the asserted presence of competitors, proper assessment is made of the capabilities of such would-be competition. In particular, sound policy should not sacrifice a meaningful and realistic assessment of *technological capability* under the mantra of technological neutrality. Regardless of technology, if certain platforms and services have not shown widespread capability to perform consistently at a certain level of performance in rural areas, such claims of coverage should not be accepted on their face. Moreover, NTCA asserted that if the Commission were to establish any challenge process that permitted parties to assert coverage beyond what they have reported on the Broadband Data Collection (“BDC”) – a process that NTCA would oppose – the Commission should then ensure such a challenge process is “two-way” and allow for corrections to BDC data for overstated claims as well. *See Ex Parte* Letter from Michael R. Romano, Executive Vice President, NTCA, to Marlene H. Dortch, Secretary, Commission, WC Docket No. 10-90, *et al.* (filed June 16, 2023).

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Finally, NTCA noted recent announcements regarding target dates for the completion of work under the Broadband Equity, Access, & Deployment (“BEAD”) program and urged the Commission to aim for comparable network deployment schedules in its own programs – while also incorporating flexibility with respect to specific timeframes given the still evolving nature of BEAD initiatives and the work now just getting underway in states to implement the program. *See Fact Sheet: Biden-Harris Administration Announces Over \$40 Billion to Connect Everyone in America to Affordable, Reliable, High-Speed Internet* (available at: <https://www.whitehouse.gov/briefing-room/statements-releases/2023/06/26/fact-sheet-biden-harris-administration-announces-over-40-billion-to-connect-everyone-in-america-to-affordable-reliable-high-speed-internet/>) (“With these allocations and other Biden administration investments, all 50 states, DC, and the territories now have the resources to connect every resident and small business to reliable, affordable high-speed internet by 2030.”)

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: Elizabeth Cuttner