

October 3, 2011

The Honorable Julius Genachowski
Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Ex Parte Letter

In the Matter of Connect America Fund, WC Docket No. 10-90; A National Broadband Plan for Our Future, GN Docket No. 09-51; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; High-Cost Universal Service Support, WC Docket No. 05-337; Developing a Unified Intercarrier Compensation Regime, CC Docket 01-92; Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Lifeline and Link-Up, WC Docket No. 03-109

Dear Chairman Genachowski:

We are writing to express our concern about proposals published by the Federal Communications Commission in February 2011 that, if adopted, would have a devastating impact on broadband in rural America.

We recognize the need to update cost-recovery systems in order to ensure all Americans have access to vital broadband services. Under existing Universal Service Fund (USF) and intercarrier compensation (ICC) rules, the Commission has advanced the public policy, as articulated by Congress, that Americans in rural and high-cost areas have access to services that are reasonably comparable in price and quality to those available in urban areas. This imperative is as important as it ever was: opportunities in the fields of education, health care, and public safety, and the general advancement of commercial industries like farming and ranching, are increasingly dependent on access to affordable, quality broadband. Robust broadband is necessary to supply our rural areas with meaningful access to distance education, telemedicine, public safety systems and economic development opportunities.

Accordingly, we urge the Commission to undertake its current broadband-oriented efforts in a way that recognizes the unique challenges of providing communication services in rural America. We also ask you to consider the landmark industry consensus letter filed July 29, 2011, by a wide range of industry participants, which indicates collective recognition of the importance of broadband deployment in rural America. The decisions you and your colleagues make today will have long-term implications for the quality of life in rural communities. We urge you to avoid reforms that would undermine the availability and affordability of the services offered by small, rural providers. Rather, the Commission should ensure that new policies enable continuation of the advancements that rural cooperative and commercial communications providers have made to provide service in high-cost and hard-to-reach areas of this country.

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Those advancements would not have been possible without USF and ICC programs, and emerging regulations should ensure that similar successes can continue and be maintained.

Thank you for your consideration.

Sincerely,

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