

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Expanding Broadband Service) RM No. 11868
Through the ACAM Program)

**SUPPORTING STATEMENT
OF
WTA – ADVOCATES FOR RURAL BROADBAND**

WTA – Advocates for Rural Broadband (“WTA”) hereby states its support for the initiation of a formal Commission rulemaking to consider the issues raised by the ACAM Broadband Coalition in its Petition for Rulemaking, dated October 30, 2020, regarding enhancements to existing high-cost support mechanisms that can bring increased access to broadband services at higher speeds in rural areas. This statement is submitted pursuant to the schedule established in the Public Notice (*Consumer & Governmental Affairs Bureau Reference Information Center Petitions for Rulemakings Filed*), Report No. 3161, November 4, 2020.

WTA is a national trade association that represents more than 350 rural telecommunications service providers that include recipients of high-cost support from both model-based and cost-based mechanisms. WTA agrees that demands for broadband services and for higher and higher broadband speeds are increasing rapidly beyond the levels supported by the existing rural high-cost mechanisms. These burgeoning needs have become particularly pressing during the current COVID-19 pandemic as quarantines and social distancing measures have resulted in massive increases in the numbers of workers and students needing high-speed broadband connections to work, attend classes and participate in video teleconferences from home. However, even if the COVID-19 pandemic were to come to a sudden end tomorrow, the various

demographic, residential, workplace, educational and health care changes that have taken place during 2020 are unlikely to return to the pre-COVID *status quo*. For the Commission and the telecommunications industry, the consequence of these changes is virtually certain to be continuing demands and needs for more and more ubiquitous broadband availability at higher and higher speeds.

WTA will wait until the proposed formal rulemaking to comment upon the specific ACAM Broadband Coalition proposals, and any additional or alternative proposals for enhancements to existing model-based and cost-based high-cost support mechanisms. Its point here is that the existing mechanisms and supported 10/1 and 25/3 Mbps services are already becoming insufficient to produce the broadband network required to meet today's needs, and are likely to become more and more outmoded within the immediate future. The requested rulemaking offers a valuable and timely opportunity for the Commission to evaluate ways to improve and augment its existing rural high-cost support mechanisms in order to meet the rapidly growing broadband needs that were not fully anticipated at the time of their adoption.

Therefore, the above premises considered, WTA urges the Commission to grant the ACAM Broadband Coalition petition, and to initiate the formal rulemaking proposed therein.

Respectfully submitted,
WTA – ADVOCATES VFOR RURAL BROADBAND

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