



Advocates for Rural Broadband

David Shipley
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May 27, 2021

Filed Via ECFS

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

**RE: Emergency Broadband Benefit Program
WC Docket No. 20-445**

Dear Ms. Dortch:

WTA – Advocates for Rural Broadband (“WTA”) is aware that members that have elected to participate in the Emergency Broadband Benefit (“EBB”) Program have been encountering significant difficulties and delays in enrolling eligible households in the National Lifeline Accountability Database (“NLAD”).

The problems appear to be affecting small carriers that must manually upload their customer data into the NLAD, and appear to be concentrated predominately (but not entirely) upon households that do not currently receive Lifeline support but rather are claiming EBB eligibility under the school lunch, Pell Grant and substantial income loss categories. One common problem seems to be that the National Verifier (“NV”) and the NLAD appear to re-format some addresses, and then to reject a household if its commonly used address designation does not match. Another apparent problem is the result of a customer giving the carrier slightly different information than what it submitted to the NV when he or she sought and received a “qualified” designation. Yet a third issue seems to have arisen when a parent applies for the EBB benefit on the basis of a child’s receipt of free school lunches or a Pell Grant.

WTA understands that these problems are complicated and exacerbated by the facts that the Universal Service Administrative Company (“USAC”) has had to modify its systems and databases during a very short time period to accommodate the EBB program, and that the USAC staff has been stretched thin by the dual tasks of implementing the EBB program and assisting service providers and consumers with their problems and questions. WTA members report long waits on USAC help lines and difficulties obtaining timely answers to questions submitted via email.

WTA is aware that some members and other service providers have or may soon seek extensions or other waivers of the initial June 1, 2021, snapshot date and the June 15, 2021, deadline for certifying reimbursement claims for the first month of EBB-supported services. This is because it appears increasingly likely that significant numbers of households that have been determined by the NV during May 2021 to be qualified for EBB-supported services will not be able to be uploaded into the NLAD by the scheduled June 1, 2021 snapshot. Grant of these extension or waiver requests will permit maximum participation in the EBB program

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by eligible households that through little or no fault of their own could not be entered into the NLAD by the June 1 snapshot.

As WTA understands them, these extension and waiver requests are limited to households that were determined by the NV to be qualified for EBB service during May 2021, and would entail only a one-time true-up of the initial June 1 snapshot and certification thereof by July 15, 2021. As such, these extensions or waivers will not materially undermine USAC's ability to track disbursements or to forecast the projected final month of EBB funding.

WTA emphasizes that NLAD upload problems are widespread and have been plaguing many small service providers that have had to submit their data manually. It therefore requests that the Commission make generally available to all similarly affected participating providers and their customers the extensions, waivers or other relief that it provides with respect to the June 1 snapshot date and the June 15 reimbursement certification date for the initial month of EBB-supported services.

Respectfully submitted,
WTA – Advocates for Rural Broadband

/s/ Derrick B. Owens

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