

November 30, 2021

Ms. Xochitl Torres Small
Under Secretary for Rural Development
USDA Rural Development
1400 Independence Avenue, SW
Washington, D.C. 20250

Dear Undersecretary Torres Small,

As current President of WTA – Advocates for Rural Broadband, I write to you on behalf of the 360 small, rural broadband providers we represent. Our member companies were eagerly awaiting the Funding Opportunity Announcement (FOA) for the third round of the ReConnect loan and grant program. We were, however, disappointed to notice that one aspect of the application scoring criteria deviates from long-standing Rural Utilities Service practice by disadvantaging privately-owned companies.

WTA's member companies are a mix of telecommunications cooperatives and private companies. The vast majority of the latter are family-owned and operated. Most of them have been providing telecommunications services to rural America for decades, some for over a century. And RUS has been a partner in that effort since its days as the Rural Electrification Administration. That is why we were disappointed to learn of this new policy position.

RUS has never viewed small, family-owned companies as providing an inferior service to their communities or less worthy of RUS' loans and grants. In fact, many for-profit providers have received ReConnect funding in the program's first two rounds. It would be nearly impossible to distinguish between the level of commitment that our not-for-profit and for-profit member companies have for their communities, the quality and affordability of telecom services provided, and their customer service standards. The fact that RUS would make a distinction in this FOA is a breach of goodwill in this nearly 100-year partnership with small rural telecommunications providers.

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Our community-based member companies, both family-owned and cooperatives, hope to compete for these vital ReConnect dollars to ensure every American living in rural areas of this country has access to the same level of communications service as their counterparts in urban areas. Corporate structure should not hinder providers from participating in the program. All providers should be on a level playing field as the application window opens. We look forward to working with you to ensure this happens in this and future rounds of funding.

Sincerely,

A handwritten signature in black ink, appearing to read "Jimmy Todd". The signature is stylized and cursive.

Jimmy Todd
CEO/General Manager
Nex-Tech

Cc: Christopher McLean, Acting Administrator, RUS