



June 30, 2023

Filed via ECFS

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

**RE: Connect America Fund, WC Docket No. 10-90
Expanding Broadband Service Through the ACAM Program, RM-11868**

Dear Ms. Dortch:

On Thursday, June 29, 2023, Derrick Owens and Gerry Duffy of WTA – Advocates for Rural Broadband (“WTA”) met via TEAMS conference bridge with Elizabeth Cuttner, Legal Advisor to Chairwoman Jessica Rosenworcel, to reiterate WTA’s support for the specific, predictable and sufficient Enhanced Alternative Connect America Cost Model (“Enhanced ACAM”) and Connect America Fund – Broadband Loop Support (“CAF-BLS”) mechanisms needed to complete the deployment of, and then to sustain, the 100/20 Mbps or better broadband networks and services that WTA members and other rural local exchange carriers (“RLECs”) have been constructing and operating in their rural service areas. It is particularly important for the Commission to build upon the investments, experience and successes of its existing High-Cost Fund mechanisms to complete the ongoing deployment of high-speed broadband in RLEC service areas in an economic and readily scalable manner, and to preserve Broadband Equity, Access and Deployment (“BEAD”) grant funding for non-RLEC areas that would otherwise be likely to remain unserved or underserved during the foreseeable future.

WTA is aware that an order is circulating with regard to pending Enhanced ACAM proposals, and with respect to modification of the CAF-BLS mechanism. It is important for the Commission to issue this order, and to complete as soon as possible any and all of the follow-up calculations that will furnish potential Enhanced ACAM and modified CAF-BLS recipients with the information concerning deployment obligations and support amounts that they need to determine whether to participate voluntarily in the mechanisms. WTA members and other RLECs need sufficient time to make the requisite decisions and elections, and enter into “enforceable commitments” to deploy qualifying 100/20 Mbps broadband service before the BEAD challenge process is concluded (currently expected on or about October 1, 2023).

The Commission is familiar with the high costs of constructing and operating broadband networks in isolated, rugged and sparsely populated rural areas, including the difficulties of maintaining rural broadband rates at affordable levels and of repaying the substantial loans incurred for previous broadband construction. Rural broadband needs and issues have become much more significant and complex in the wake of the COVID-19 quarantines due to the migration of businesses, families and jobs from congested areas as well as increased demand for broadband services to support work-from-home, distance learning and remote medical services. WTA hopes that the ultimately adopted order and revised high-cost support mechanisms will provide sufficient funding to encourage and enable RLECs to complete their deployment

of 100/20 Mbps and better broadband networks, to permit those RLECs that have already deployed such high-speed networks to repay their construction loans, and to permit all RLECs to maintain and sustain their broadband networks after initial construction is completed.

One issue of particular concern to WTA is the eligibility of ACAM I recipients to receive Enhanced ACAM support for those census blocks in their service areas that were denied ACAM I support in 2016 due to the provision therein of 10 Mbps or better broadband service using fiber-to-the-premises (“FTTP”) or cable technologies. Due to the vagaries of FCC Form 477 reporting, some of these census blocks were excluded even though only a portion of the locations therein actually had access to FTTP or cable service. In addition, these areas have been and continue to be subject to substantial service and location upgrades, as well as maintenance and other operating expenses, as services evolve from the 25/3, 10/1 and 4/1 Mbps standards at the time that ACAM I eligibility and service determinations were made to today’s 100/20 Mbps and better world. Finally, the initial voluntary ACAM I recipients were treated much differently and more severely than the subsequent ACAM II electees that were allowed to receive ACAM support for portions of their service areas that contained substantially similar broadband facilities. Equity requires that the early ACAM I adopters be treated the same as the subsequent ACAM II recipients, and be allowed to receive Enhanced ACAM for the formerly excluded census blocks.

Pursuant to Section 1.1206(b) of the Commission's Rules, this submission is being filed for inclusion in the public record of the referenced proceeding.

Respectfully submitted,
WTA – ADVOCATES FOR RURAL BROADBAND
/s/ Derrick B. Owens
Senior Vice President of Government and Industry Affairs
/s/ Gerard J. Duffy
Regulatory Counsel
400 Seventh Street NW, Suite 406
Washington, DC 20004
Phone: (202) 548-0202

cc: Elizabeth Cuttner