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

In the Matter of	)	
	)	
Safeguarding and Securing the Open Internet	)	WC Docket No. 23-320
	)	

COMMENTS
OF
WTA – ADVOCATES FOR RURAL BROADBAND

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Derrick B. Owens
Senior Vice President of Government and Industry Affairs

Gerard J. Duffy
Regulatory Counsel

400 Seventh Street NW, Suite 406
Washington, D.C. 20004
Tel: (202) 548-0202

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Summary

Assuming that the Commission adopts the *NPRM's* proposed re-classification of Broadband Internet Access Service ("BIAS") as a Title II telecommunications service, WTA – Advocates for Rural Broadband ("WTA") has no objection to the proposed Open Internet blocking, throttling or paid prioritization rules as long as they are subject to reasonable network management exceptions. However, WTA opposes the consideration of additional transparency requirements unless and until it is determined that customers actually want, need and will use more information than they receive pursuant to the existing broadband transparency and broadband label rules.

WTA opposes forbearance from imposition upon BIAS of the Universal Service Fund ("USF") contribution obligations imposed upon all telecommunications carriers by Sections 254(d) and 254(b)(4) of the Act. It is reasonable and equitable to assess USF contributions upon BIAS because the High Cost, Schools and Libraries, and Rural Health Care programs have increasingly focused upon the deployment and availability of BIAS, while BIAS service providers and subscribers benefit substantially due to network effects from the increasing numbers of entities with which they can communicate due to deployments and services made possible and affordable by USF support. Moreover, the forbearance standards of Section 10 of the Communications Act would not be met because the exemption of the large and growing class of BIAS telecommunications services, providers and customers from USF contributions – whether characterized as unjust discrimination or undue preference – is unreasonable, is unnecessary for the protection of consumers, and is not consistent with the public interest. Concerns that USF contribution pass-throughs might adversely affect the affordability of BIAS for some low-income

customers can be readily resolved by exempting from USF contributions the BIAS services subscribed to by eligible Lifeline and Affordable Connectivity Program ("ACP") households. Also, the potential impacts of USF contributions upon broadband affordability and adoption can be reduced if the Commission receives statutory authority to assess USF contributions upon certain large edge providers.

WTA also opposes forbearance from the application of the negotiation and arbitration provisions of Sections 251 and 252 of the Act to BIAS and other IP interconnection. Small BIAS provider acquisitions of middle mile transport, Internet backbone transport and points of interconnection are subject to the same disadvantages and discrepancies in negotiation power and resources that Sections 251 and 252 were designed to address. Whereas WTA members and other BIAS providers are deploying high-speed broadband networks in their rural service areas, quality and affordable BIAS and other IP interconnection and middle mile transport are necessary for their customers to receive quality BIAS services that are reasonably comparable to those offered in urban areas at reasonably comparable rates.

Finally, WTA requests simplification and clarification of the scope and requirements of any new Title II cybersecurity obligations imposed upon RLEC ISPs. In particular, the Commission needs to clarify the nature and extent of the responsibilities of RLECs and RLEC ISPs to protect their networks and particularly the customer data in their possession. The Commission can then improve BIAS cybersecurity procedures by providing a single portal for all BIAS cybersecurity reporting required by the various federal agencies, by simplifying the federal cybersecurity plan requirements and incident reporting procedures and timelines applicable to BIAS and other broadband service providers, and by furnishing additional high-cost support for the recovery of the substantial and increasing BIAS cybersecurity costs incurred by USF recipients.

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WTA – Advocates for Rural Broadband ("WTA") submits its comments in response to the Commission's *Notice of Proposed Rulemaking* (Safeguarding and Securing the Open Internet), FCC 23-83, released October 20, 2023 ("*NPRM*").

WTA is a national trade association that represents more than 370 rural local exchange carriers ("RLECs") that provide voice and broadband services to some of the most rural, remote, rugged, sparsely populated and expensive-to-serve areas of the United States.

Assuming that the Commission adopts the *NPRM's* proposed re-classification of Broadband Internet Access Service ("BIAS") from an information service to a telecommunications service regulated under Title II of the Communications Act of 1934, as amended ("the Act"), WTA members will continue to need to be able to block cyberattacks, robocalls and similar unlawful traffic to protect their networks and customers and will continue to need the option to throttle traffic to manage their networks and limit severe service quality degradation during times of extreme congestion. However, other than these narrow and permissible network management exceptions, WTA members do not engage in the blocking, throttling and paid prioritization practices that are proposed to be prohibited by the Commission's proposed Open Internet conduct rules. WTA therefore does not oppose them. With respect to Open Internet transparency rules,

WTA members comply with the Commission's existing broadband transparency rules and are implementing the Commission's broadband label rules. WTA requests that the Commission monitor the effectiveness of these existing broadband transparency and broadband label rules before considering any additional Open Internet transparency requirements.

However, if the Commission reclassifies BIAS as a Title II telecommunications service, WTA opposes the proposed forbearance from the assessment of Universal Service Fund ("USF") contributions upon BIAS and other broadband services and the proposed forbearance from the inclusion in the Section 251 and 252 negotiation and arbitration process of arrangements and disputes regarding the interconnection of BIAS and other Internet Protocol ("IP") broadband services.

Given that the High Cost, Schools and Libraries, and Rural Health Care programs are primarily focused upon the deployment and availability of quality and advanced BIAS and other broadband services, it is reasonable and equitable under Sections 254(b)(4) and 254(d) of the Act that USF contributions be assessed upon BIAS and other broadband telecommunications services whose customers benefit significantly from the network effects of such USF programs. In fact, the Section 10 forbearance standards would not be met because the proposed forbearance would unduly discriminate by exempting the large class of broadband telecommunications carriers from USF contributions while continuing to assess such contributions upon other classes. To the extent that pass-throughs of USF contributions might adversely affect the affordability of BIAS for some low-income customers, the BIAS services subscribed to by eligible Lifeline and Affordable Connectivity Program ("ACP") households could be exempted from USF contributions. In addition, the potential impacts of USF contributions upon BIAS affordability and adoption can be reduced by seeking and obtaining statutory authority for the Commission also to assess USF

contributions upon certain large edge providers. These entities profit significantly from their ability to place large amounts of traffic on the broadband network while imposing significant network upgrade, middle mile and other costs upon RLECs and other Internet service providers ("ISPs") that carry and deliver their traffic at little or no cost to such edge providers.

WTA also opposes forbearance from the Section 251/252 negotiation and arbitration process for interconnection arrangements and disputes regarding BIAS and any other IP broadband services. Many RLECs and their ISP affiliates are forced to deal with large Internet backbone and middle mile transport providers subject to the same disadvantages and discrepancies in negotiation power and resources that Sections 251 and 252 were designed to address with respect to voice services. WTA members have encountered refusals to upgrade the capacity and quality of middle mile facilities, take-it-or-leave it offers rather than *bona fide* negotiations of IP interconnection and traffic exchange terms and conditions, and demands that broadband traffic be accepted at and delivered to large carrier facilities in distant cities at the WTA member's expense. Whereas WTA members and other RLECs are investing large sums and working hard to deploy high-speed broadband networks and provide state-of-the-art broadband services in their rural service areas, quality and affordable BIAS and other IP interconnection is necessary for their customers to receive broadband services reasonably comparable to those offered in urban areas at reasonably comparable rates.

Finally, WTA recognizes that the Commission has a role to play with respect to cybersecurity issues, but is concerned about the nature and extent both of the Commission's role and of the responsibilities of RLECs. WTA members and other RLECs are currently subject to the Commission's Customer Proprietary Network Information ("CPNI") requirements as well as the conditions of their cybersecurity insurance policies. Many RLECs, including Enhanced ACAM

participants, are required to adopt and implement cybersecurity plans based significantly on National Institute of Standards and Technology ("NIST") standards and recommendations, and may also ultimately become subject to Cybersecurity and Infrastructure Security Agency ("CISA") programs and requirements. The Commission could enhance RLEC cybersecurity by providing a single portal for all RLEC cybersecurity reporting required by the various federal agencies, by simplifying as much as possible the applicable federal cybersecurity plan requirements and incident reporting procedures for BIAS and other broadband service providers, and by providing additional USF support for the recovery of substantial and increasing cybersecurity costs. In addition, the Commission needs to clarify the nature and extent of the responsibilities of RLECs to protect their networks and particularly the customer data in their possession.

Proposed Open Internet Rules

Assuming that the Commission adopts the proposed BIAS reclassification, WTA has no objection to the blocking, throttling and paid prioritization rules proposed in the *NPRM*. However, it believes that additional accessibility requirements are not necessary at this time and that the effectiveness of the existing broadband accessibility rules and the new broadband label requirements currently being implemented should be determined before additional accessibility rules are proposed and considered. Finally, WTA notes that the *NPRM's* assumptions regarding the economic incentives of ISPs to exploit their "gatekeeper role" to block or disadvantage edge providers and otherwise to harm "the open nature of the Internet" are NOT applicable to WTA members and other RLECs.

WTA members do not generally block traffic on their broadband networks. In certain limited situations, they may block cyberattacks, robocalls and similar unlawful traffic to protect their networks and customers. In virtually all such instances, the blocking is done in compliance

with Commission or other federal regulations, or in response to legitimate and *bona fide* requests from law enforcement or affected customers. In other instances, blocking may occur as an indirect result of compliance with the "notice and take down" provisions of federal Copyright law. It is WTA's understanding that such limited blocking is fully consistent with, and fully permissible as, "reasonable network management" under the *NPRM's* proposed blocking rule.

WTA members may occasionally need to throttle[1] traffic to manage their networks and limit service quality degradation during times of extreme congestion. Particularly as WTA members and other RLECs increase the speeds and capacities of their fiber optic networks, throttling is an extremely rare occurrence. It is primarily an option of last resort if spikes in the traffic of a customer or small group of customers is degrading or threatening to degrade the service of an RLEC ISP's other customers. It is WTA's understanding that any such rare resort to throttling to address an instance of extreme congestion would be permissible under the "reasonable network management" exception.

WTA is aware of no members who charge or plan to charge edge providers for paid prioritization. Whereas paid prioritization appears to be a practice of some Internet search engines operated by edge providers, WTA members and other RLECs do not have the market power, large subscriber bases or other capabilities to charge or collect paid prioritization fees from edge providers and do not have business plans that include such fees as an actual or potential revenue source.[2]

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[1] As WTA understands it, "throttling" refers to a service provider's deliberate impairment or degradation of a broadband communication by reduction of the speed thereof below the speed of the broadband service tier to which a customer subscribes. It is not "throttling" if a broadband communication is impaired or degraded because a customer subscribes to a service tier that has a speed too low to permit quality reception of a certain communication or series of communications.

[2] As indicated below, WTA supports legislation that would require the Commission to impose and collect USF contributions from certain large edge providers that profit significantly from their use of the broadband network while imposing substantial costs upon broadband networks. However, USF contributions by edge providers are very

In fact, contrary to the broad assumptions about ISPs in paragraph 123 of the *NPRM*, WTA members and other RLEC ISPs do not have economic incentives or market power to cause unreasonable interference or unreasonable disadvantage to consumers or edge providers, or otherwise to engage in practices that pose a threat to Internet openness. RLEC ISPs are too small in size and resources to serve as effective "gatekeepers" to control or limit the access of their relatively small subscriber bases to edge provider applications, services and devices, and reciprocally to control or limit edge provider access to their small customer bases. For example, the typical WTA member has between 3,000 and 5,000 customers – a customer base far too small to materially disadvantage or interfere with most edge providers, or force them to negotiate or pay prioritization or other fees. Likewise, RLEC ISPs have no incentive to prefer their own or affiliated content because most lack the scale and resources to produce significant amounts, if any, of such content. RLEC ISPs need to deploy and upgrade their broadband networks to reach as many of their limited rural customer locations as feasible or required, and to convince as many potential customers as possible to subscribe to their services. This necessity to maximize rural customer adoption eliminates incentives to deploy technical barriers that limit or otherwise impact the ability of their existing and potential customers to reach various edge providers. Rather, RLECs want their existing and potential customers to be able to reach as many edge providers and other destinations as possible in order to encourage them to order and retain service. In sum, WTA members and other RLECs are essentially small providers of basic local BIAS transmission services and a few peripheral services that are not in competition with content services and other edge providers. They have neither the size nor market power nor incentives to demand fees from, or otherwise discriminate against or disadvantage, edge providers.

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different from prioritization or other fees charged directly to edge providers by BIAS and other broadband service providers.

With respect to Open Internet transparency rules, WTA members comply with the Commission's existing broadband transparency rules and are implementing the Commission's broadband label rules. WTA requests that the Commission monitor the effectiveness of its existing broadband transparency and broadband label rules before proposing or adopting additional Open Internet transparency requirements. The key question is: what types of information do current and potential BIAS customers actually want and use? Existing transparency rules and/or the broadband label requirements being implemented give the public substantial amounts of information regarding prices and fees, download and upload speeds and latency, data usage caps and overage charges, privacy and redress policies, and network management practices. In the experience of WTA members, this information is more than enough for virtually all customers and other interested parties to make purchase and service decisions and comparisons. Very few customers are likely to have significant interest in various additional information that the Commission has previously refused to include in its transparency requirements – such as network congestion data, packet corruption and jitter, and application-specific usage. Collection and disclosure of such additional data would entail potential information overload for most customers while imposing significant unnecessary expense upon service providers. Finally, the current arrangement wherein interested entities can review transparency information when they wish on websites and at points of sale is wholly reasonable and sufficient. Requiring direct notification would entail major hardship and unnecessary expense for service providers to maintain accurate and up-to-date versions of the frequently changing lists of their customers and contact addresses (whether email, text or physical).

Opposition to Forbearance Proposals

Assuming that the proposed BIAS reclassification is adopted, WTA opposes: (a) the proposed forbearance from the assessment of USF contributions upon BIAS and other broadband services; and (b) the proposed forbearance from the inclusion of BIAS and other IP interconnection in the Section 251 and 252 negotiation and arbitration process.

A. USF Contributions Should Be Assessed Upon Broadband Services

The proposed forbearance should be rejected, and USF contributions should be assessed upon BIAS and other broadband services. The Commission has long had authority to impose USF contributions upon BIAS and other broadband service providers pursuant to the last sentence of Section 254(d) of the Act because they are "any other provider[s] of interstate telecommunications" and it can be determined that "the public interest so requires." However, if BIAS is reclassified as a "telecommunications service" and BIAS providers become "telecommunications carriers," Section 254(d) requires that "[e]very telecommunications carrier that provides interstate telecommunications services shall contribute, on an equitable and nondiscriminatory basis, to the specific, predictable, and sufficient mechanisms established by the Commission to preserve and advance universal service" unless such carrier's contribution would be *de minimis*. In addition, the principle adopted in Section 254(b)(4) of the Act states that "[a]ll providers of telecommunications services should make an equitable and nondiscriminatory contribution to the preservation and advancement of universal service."

It is eminently reasonable and equitable under both Section 254(b)(4) and Section 254(d) that USF contributions be assessed upon BIAS and other broadband telecommunications services. During recent years, the High Cost, Schools and Libraries, and Rural Health Care programs have all become increasingly focused upon the deployment and availability of BIAS and other

broadband services. BIAS service providers and subscribers benefit directly and substantially due to network effects from the increasing numbers of households, businesses, schools, libraries and medical facilities with which they can communicate due to deployments and services made possible and affordable due to USF support.

In fact, the Section 10 forbearance standards would not be met because forbearance would unjustly and unreasonably discriminate in favor of the large and growing class of BIAS telecommunications services, providers and customers by exempting them from USF contributions while other classes of telecommunications service providers continue to be assessed. Such different treatment of BIAS services, carriers and customers – whether characterized as unjust discrimination or undue preference under Section 202(a) of the Act – is unreasonable, is unnecessary for the protection of consumers, and is not consistent with the public interest.

WTA is aware of no principle or circumstance that can justify this unreasonable discrimination or preference. Whereas some pressure groups have previously remonstrated against "taxing" the Internet, Amazon and other retail edge providers have long been assessing sales tax on purchases without significant consumer protest, much less the destruction of Internet commerce. Some argue that pass-throughs of USF contributions might adversely affect the affordability of BIAS for some low-income customers, but these concerns can be readily resolved by exempting from USF contributions the BIAS services subscribed to by eligible Lifeline and Affordable Connectivity Program ("ACP") households. Such exemptions would be fully consistent with the *de minimis* exemption already permitted by Section 254(d) of the Act.

For all of the foregoing reasons, the proposed forbearance should be denied, and USF contributions should be assessed on BIAS and related broadband telecommunications service revenues.

Further, the potential amounts of BIAS USF contributions and their impacts upon broadband affordability and adoption can also be reduced if the Commission and other interested parties convince Congress to grant statutory authority for the Commission to assess USF contributions upon certain large edge providers.[3] These entities profit significantly from their ability to place large amounts of traffic on the broadband network while imposing significant network upgrade, middle mile and other costs upon RLECs and other ISPs that carry and deliver their traffic at little or no cost to such edge providers.

B. BIAS and IP Interconnection Should Be Subject to the Section 251/252 Procedures

WTA also opposes forbearance that would exclude BIA and other IP interconnection from the protections and procedures of the negotiation and arbitration requirements of Section 251 and 252 of the Act.

Some RLECs and their affiliated ISPs have access to regional and state fiber rings and networks that allow aggregation of small carrier traffic and enable at least some reductions in middle mile transport distances and costs. Many other RLEC ISP affiliates still have to obtain middle mile service from large unrelated carriers under circumstances where they have little or no negotiating power.[4] Ultimately, whether or not they can aggregate their traffic with that of other BIAS service providers, most RLEC ISPs have to deal directly or indirectly with large Internet backbone providers in order to determine the locations and costs of their interconnections with the Internet. In fact, many RLECs have found it necessary to establish two separate points of

[3] There is currently a bill pending in the Senate – S.3321, The Lowering Broadband Costs for Consumer Act – that would authorize and require the Commission to assess USF contributions upon large edge providers.

[4] It is not yet clear how much the Middle Mile grant programs funded by the Infrastructure Investment and Jobs Act and other sources will increase the availability and quality, and reduce the cost, of middle mile transport. It is also not yet clear which RLEC and ISP service areas will benefit from these middle mile programs, and what will be the nature and extent of such benefits.

interconnection with the Internet and to bear the costs of two separate routes to these points in order to provide the reliable BIAS service demanded by their rural customers.

RLEC ISP acquisitions of middle mile transport, Internet backbone transport and points of interconnection are subject to the same disadvantages and discrepancies in negotiation power and resources that Sections 251 and 252 were designed to address. In many cases, the traffic and revenue amounts generated by the RLEC entities are not material to large carriers with which they must deal, with the result that some large carriers show little or no interest in negotiating interconnection and middle mile transport arrangements. WTA members have encountered refusals to upgrade the capacity and quality of middle mile facilities, take-it-or-leave it offers rather than *bona fide* negotiations of IP interconnection and traffic exchange terms and conditions, and demands that broadband traffic be accepted at and delivered to large carrier facilities in distant cities at the WTA member's expense. Whereas WTA members and other RLECs are investing large sums and working hard to deploy high-speed broadband networks and provide state-of-the-art BIAS and other broadband services in their rural service areas, quality and affordable BIAS and other IP interconnection and middle mile transport are necessary for their customers to receive broadband services reasonably comparable to those offered in urban areas at reasonably comparable rates.

Including BIAS and related IP interconnection within the Section 251/252 negotiation and arbitration procedures would greatly assist the efforts of RLECs and other small BIAS providers to obtain fair and reasonable arrangements for interconnection with the Internet. As has been the case with local exchange competition, the prospect of arbitration has encouraged the majority of negotiating parties to reach acceptable compromises to resolve disputed interconnection and traffic exchange issues without litigation. WTA sees no indication that this pattern would differ for IP

interconnection negotiations. Rather, the Section 251/252 process would most likely continue to be a successful device to encourage dominant large carriers to negotiate reasonable BIAS and other IP interconnection arrangements with RLEC and other small ISPs, while involving state commissions or the Commission in arbitration settlements or full arbitration proceedings only in rare instances when the parties cannot reach agreement on certain issues. Such infrequent arbitration proceedings would have the added benefit of giving state commission or Commission personnel valuable insight and exposure with respect to developing industry issues and problems that might warrant more general investigation and action.

Cybersecurity Issues

The *NPRM* places substantial emphasis upon national security and public safety concerns as the basis for its proposed BIAS reclassification. WTA and its members are painfully aware that the great benefits and opportunities of broadband are unfortunately accompanied by temptations for domestic and foreign hackers to engage in criminal intrusions and activities.

In the event of BIAS reclassification, WTA believes that the Commission can contribute significantly to improving the efficiency and effectiveness of cybersecurity procedures in the broadband industry by providing a single portal to be used by BIAS and other broadband service providers for all cybersecurity reporting required by the various federal agencies, by simplifying as much as possible the federal cybersecurity plan requirements and incident reporting procedures and timelines applicable to BIAS and other broadband service providers, and by furnishing additional high-cost support for the recovery of the substantial and increasing BIAS cybersecurity costs incurred by USF recipients.

WTA members and other RLECs are currently subject to the Commission's Customer Proprietary Network Information ("CPNI") requirements as well as the conditions of their

cybersecurity insurance policies. Many RLECs, including Enhanced ACAM participants, are required to adopt and implement cybersecurity plans based significantly on National Institute of Standards and Technology ("NIST") standards and recommendations, and may also ultimately become subject to Cybersecurity and Infrastructure Security Agency ("CISA") programs and requirements. The Commission can effectively enhance BIAS cybersecurity by consolidating and simplifying the various federal cybersecurity regulations and reporting procedures so that small RLEC ISP staffs are not confused and overwhelmed by multiple and sometimes differing rules and procedures.

In addition, the Commission needs to clarify the nature and extent of the responsibilities of RLECs and RLEC ISPs to protect their networks and particularly the customer data in their possession. WTA members work hard to protect their own network facilities and their own databases where they store company and customer information. However, it does not appear that any entity - including government agencies and large corporations – has been able to attain and maintain perfect or even near-perfect security against cyber intrusions, and that no amount of spending on cybersecurity hardware, software and expert personnel appears yet to have ensured effective long-term protection against changing intrusion tactics. Under such circumstances, the Commission needs to recognize limits and provide safe harbors regarding the nature and amount of cybersecurity that RLEC and other small ISPs must provide. And it must limit the cybersecurity obligations of RLEC and other small ISPs to their own networks and databases. For example, many RLECs that use third party billing services can include cybersecurity requirements and representations in their contracts with such services, but have little ability to monitor and ensure billing service compliance with such cybersecurity provisions. Similarly, RLEC ISPs cannot monitor the emails and texts received by their BIAS customers for phishing and other hacking

efforts, or protect their BIAS customers from picking up and being harmed by malware on the websites they visit. Such monitoring would not only be prohibitively time-consuming and expensive, but would also violate privacy laws and expectations and destroy the viability of important copyright law safe harbors. Any Commission Title II cybersecurity rules and clarifications should expressly recognize the substantial difference between a telecommunications network that has virtually no control over customer activities and content, versus non-telecommunications but content-rich hacking targets such as banks, brokerages, retail stores and government agencies.

Any Commission Title II cybersecurity regulation should recognize that most RLECs and RLEC ISPs have relatively small staffs, and that many have difficulties recruiting and retaining experienced cybersecurity professionals for their rural communities and service areas. The typical WTA member has approximately 15 to 25 employees who must perform a broad range of administrative, operational, maintenance, installation, accounting and customer service functions. Given the difficulties of retaining cybersecurity expertise, many RLEC ISPs must rely upon cybersecurity consultants that interface with RLEC employees who have substantial other responsibilities.

Given that many large corporations and government agencies that have spent large sums on cybersecurity systems and staffs have been unable to prevent their data from being hacked and stolen, RLEC ISPs are struggling with the very high cost of the cybersecurity systems, consultants, personnel, training and insurance needed to attain reasonable or effective cybersecurity protection for their own networks and their own customer databases. Additional USF support is necessary to recover rapidly growing cybersecurity costs. Increased USF support will be even more critical if

the Commission imposes substantial and expensive further Title II cybersecurity requirements upon RLEC ISPs.

Conclusion

Assuming that the Commission adopts the *NPRM's* proposed re-classification of BIAS as a Title II telecommunications service, WTA: (1) has no objection to the proposed blocking, throttling or paid prioritization rules as long as they are subject to reasonable network management exceptions; (2) opposes consideration of additional transparency requirements unless and until it is determined that customers will need and use more information than they receive pursuant to the existing broadband transparency and broadband label rules; (3) opposes forbearance from imposition upon BIAS of the USF contribution obligations imposed upon all telecommunications carriers by Sections 254(d) and 254(b)(4) of the Act; (4) opposes forbearance from the application of the negotiation and arbitration provisions of Sections 251 and 252 of the Act to BIAS and other IP interconnection; and (5) requests simplification and clarification of the scope and requirements of any new Title II cybersecurity obligations imposed upon RLEC ISPs, plus additional USF support to recover burgeoning cybersecurity costs.

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, D.C. 20004
Tel: (202) 548-0202

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