



Advocates for Rural Broadband

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January 19, 2024

**VIA ECFS**

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

**RE: Affordable Connectivity Program, WC Docket No. 21-450  
Connect America Fund, WC Docket No. 10-90  
Expanding Broadband Service Through the ACAM Program, RM-11868**

Dear Ms. Dortch:

On Wednesday, January 17, 2024, Jerry Piper of Cambridge Telephone Company (Idaho), Kip Wilson of Direct Communications (Maine, Missouri, Louisiana, Idaho, Utah, Colorado, Oregon and Washington), and Derrick Owens and Gerry Duffy (by telephone) of WTA – Advocates for Rural Broadband (“WTA”) met with Elizabeth Cuttner, Legal Advisor, Wireline and Enforcement, and Rashann Duvall, Legal Advisor, Affordable Connectivity Program and Wireline, to Chairwoman Jessica Rosenworcel, to discuss the Affordable Connectivity Program (“ACP”) and some initial location concerns with respect to the Enhanced Alternative Connect America Cost Model (“E-ACAM”) program.

WTA noted that it now has approximately 400 rural local exchange carrier (“RLEC”) members nationwide, including the companies represented by Mr. Piper and Mr. Wilson.

While recognizing that continued funding of the ACP program was a Congressional matter outside the Commission’s control, the WTA members emphasized the hardships and complications that will result from a permanent termination or temporary interruption of the program. Depending upon the demographics of their service areas, WTA estimates that its members have from about 10 percent to over 50 percent of their rural customers enrolled in the ACP program. Messers. Piper and Wilson indicated that the program was important and effective, particularly for lower-income customers who could now afford broadband for online school and medical purposes.

WTA has shared with its members the ACP wind-down guidance that was recently issued by the Commission. Members are starting to take the steps required to comply with the Commission’s guidance (e.g., the 90-60-30-day notices to customers about the program no longer being available and what that means to ACP customers). If delays in Congressional reauthorization or extension cause the ACP program to be suspended or terminated for a period, WTA and its members urge the Commission to make it as simple and rapid as possible for RLECs and other service providers to re-qualify eligible customers and resume their ACP broadband service.

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Messrs. Piper and Wilson praised the dignity of the Commission's ACP qualification process. In particular, the ability of interested recipients to apply and qualify online without the need for personal interviews has simplified ACP administration and made the eligibility process much more comfortable for both customers and service providers.

WTA noted that many members were reluctant to provide ACP broadband service to customers at no charge due to the Commission's requirement to monitor the usage of such "free" services and to terminate them when they are not used for 30 days. WTA has previously argued that the "30-day rule" made sense to curb abuses with respect to disposable mobile phones with limited minutes of use, but was not necessary where fixed broadband service users had to invest time and money to have their service installed and set up.

The WTA members noted that the Commission should be aware that some ACP service providers appear to be requiring their ACP customers to enter into two-year service contracts in violation of Commission rules. No specific allegations were made; rather, it was suggested that this was an issue for potential monitoring and investigation.

Finally, the WTA members noted that they were already finding significant discrepancies between the CostQuest-estimated locations in the Enhanced Alternative Connect America Cost Model ("Enhanced ACAM") offers that they accepted versus the actual locations in their service areas as of the date of the Enhanced ACAM offers. The WTA members recognize that there will be challenge processes and true-ups before the final Enhanced ACAM locations as of the offer date are determined by December 2025.

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**

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