



Advocates for Rural Broadband

Pat McElroy  
President

Kelly Worthington  
Executive Vice President

February 26, 2024

**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**

Dear Ms. Dortch:

On Thursday, February 22, 2024, Evelyn Jerden of LICT Corporation (via TEAMS link); Douglas Meredith of JSI; and Derrick Owens and Gerry Duffy representing WTA – Advocates for Rural Broadband (“WTA”) met with Suzanne Yelen, Ted Burmeister and Nathan Eagan (via TEAMS link) of the Wireline Competition Bureau (“WCB”) and Paul LaFontaine (via TEAMS link) of the Office of Economics and Analytics (“OEA”) to discuss concerns regarding the true-up of Enhanced Alternative Connect America Cost Model (“Enhanced A-CAM”) locations that is scheduled to be completed by December 31, 2025.

WTA expressed its concern with the material and substantial change between the WCB’s assertion in its August 30, 2023 Enhanced A-CAM Offer Public Notice (DA 23-779, footnote 6) that WCB and OEA would ultimately rely on Version 3 of the Fabric and the National Broadband Map showing serviceable locations as of June 30, 2023 to make true-up adjustments of Enhanced A-CAM locations (confirming the expectation stated by the Commission in footnote 146 of the July 24, 2023 *Enhanced A-CAM Order*, FCC 23-60) versus the WCB’s post-election statements in its January 25, 2024 Enhanced A-CAM Eligible Locations True-Up Public Notice (DA 24-78) that it intends instead to use Version 4 of the Fabric (generated between July and December 2023) and Broadband Data Collection (“BDC”) data as of December 31, 2023 for the true-up process. The proposed use of data that includes a period of four months after the August 30, 2023 Enhanced A-CAM offer date has raised concerns that the true-up will include changes in locations, unsubsidized competitor services and enforceable commitments that occurred after the August 30, 2023 offer date that was repeatedly asserted by the Commission and WCB to be the cut-off date for location true-ups and upon which carriers relied in major part in making their Enhanced A-CAM elections.

The WTA representatives and Mr. Meredith discussed a number of principles and approaches that might be able to reconcile data availability matters with the pre-election representations of the Commission and WCB that were materially and detrimentally relied upon by WTA members and other rural local exchange carriers (“RLECs”) in making their Enhanced A-CAM elections on or before September 29, 2023. WTA made it clear that, whatever approach is ultimately employed, the December 2025 true-ups must reflect the actual Fabric locations, unsubsidized competitor situations and enforceable commitments that were in existence as of the August 30, 2023 Enhanced A-CAM offer date as repeatedly promised by the Commission and WCB.

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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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