



Advocates for Rural Broadband

Pat McElroy
President

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April 16, 2024

VIA ECFS

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

RE: Safeguarding and Securing the Open Internet, WC Docket Nos. 23-320 and 17-108

Dear Ms. Dortch:

On Monday, April 15, 2024, Derrick Owens and Gerry Duffy of WTA – Advocates for Rural Broadband met with Justin Faulb, Chief of Staff and Legal Advisor for Wireline and National Security to Commissioner Geoffrey Starks, to discuss the proposal in the Safeguarding and Securing the Open Internet draft Order regarding forbearance from assessing Universal Service Fund (“USF”) contributions on broadband internet access service (“BIAS”).

WTA believes that the existing USF contribution system is not sustainable. Continuing to assess long distance toll service and mobile voice service is not equitable given that the existing high cost, schools and libraries and rural health care programs predominately support broadband deployment and operations. This situation will be exacerbated further if the Affordable Connectivity Program (“ACP”) is brought into the Commission’s USF program or replaced with a modified Lifeline program.

Given that the USF contribution system needs to be reassessed and modified to provide equitable and sufficient support for broad range of broadband services, WTA urges the Commission not to make it more difficult to assess USF contributions upon BIAS services by forbearing from the first sentence of Section 254(d) of the Communications Act.

Notwithstanding the Commission’s assurances, it is not clear how difficult or time consuming it will be to review or revoke a determination to forbear from assessing USF contribution upon BIAS. Rather, WTA urges the Commission to delete any discussion of forbearance and instead to include the question of whether and how to assess USF contributions upon BIAS as part of a broad rulemaking looking to reform and expand the USF contribution system.

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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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/s/ Gerard J. Duffy

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cc: Justin Faulb