



Advocates for Rural Broadband

Pat McElroy  
President

Kelly Worthington  
Executive Vice President

August 30, 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  
ETC Annual Reports and Certifications, WC Docket No. 14-58  
Telecommunications Carriers Eligible to Receive Universal Service  
Support, WC Docket No. 09-197  
Connect America Fund – Alaska Plan, WC Docket No. 16-271  
Expanding Broadband Service Through the ACAM Program, RM-11868**

Dear Ms. Dortch:

On Wednesday, August 28, 2024, Evelyn Jerden of LICT Corporation, Mark Gailey of Totah Communications, Sara Cole of TDS Telecom, Dustin Durden of Pineland Telephone Cooperative, David Shipley of Highline, Michael Guffy of Shawnee Communications, Tom Campbell of Olsen Thielen, Karen Jackson-Furman of WK&T, Douglas Meredith of JSI, and Derrick Owens and Gerry Duffy of WTA – Advocates for Rural Broadband (“WTA”) met with Ted Burmeister, Special Counsel to the Wireline Competition Bureau’s (“WCB’s”) Telecommunications Access Policy Division, via TEAMS conference call, to discuss various issues, difficulties and concerns relating to the ongoing true-up of service and deployment obligations and support adjustments with respect to the Enhanced Alternative Connect America Cost Model (“Enhanced ACAM”) program.

WTA requested that the WCB prepare and make available an illustrative example detailing the assumptions (including the composition and method of determining location costs) and calculations that it will employ to adjust a hypothetical recipient’s Enhanced ACAM support if the percentage change is: (a) by an amount between five percent (5%) and fifteen percent (15%) of its obligated locations; and (b) by an amount greater than fifteen percent (15%) of its obligated locations. Such an illustrative example and permutations will enable Enhanced ACAM recipients struggling to understand their potential true-ups and impacts to determine the nature and size of actual problems and changes and will allow recipients and the WCB to better focus upon significant problem areas and alternatives. WTA understands that this proposal is similar to one previously advanced by the ACAM Broadband Coalition.

WTA has consistently proposed that the point of comparison for the “less than 5%,” “5% to 15%” and “greater than 15%” calculations be the “total locations” within the subject service area. That is a fair standard because there is no guarantee that unsubsidized competitors will continue to provide 100/20 Mbps or better service or that enforceable commitments by other service providers will be met. These circumstances may entail changes in service and deployment conditions as well as support adjustments during the term of the Enhanced ACAM program.

Marlene H. Dortch, Secretary  
August 30, 2024  
Page 2 of 2

However, if for any reason the WCB determines not to employ “total locations” as the point of comparison, “obligated locations” constitute a more appropriate point of comparison than the “required (presently unserved) locations” to which the Enhanced ACAM recipient is required to deploy service. “Obligated locations” include all locations within the service area to which the Enhanced ACAM recipient is required to serve including both locations where 100/20 Mbps service will be deployed and those locations where the Enhanced ACAM provider has committed in the program to maintain existing service. “Obligated locations” constitutes an equitable methodology because it measures any location adjustment in terms of the ILEC recipient’s entire existing 100/20 Mbps broadband service commitment.

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: Theodore Burmeister