



Advocates for Rural Broadband

Pat McElroy
President

Kelly Worthington
Executive Vice President

February 18, 2025

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
Report on the Future of the Universal Service Fund, WC Docket No. 21-476**

Dear Ms. Dortch:

On Thursday, February 13, 2025, representatives and members of WTA – Advocates for Rural Broadband (“WTA”) met with Adam Cassady, Chief of Staff, and David Brodian, Senior Legal Advisor to Commissioner Nathan Simington. The WTA members attending the meeting were Evelyn Jerden of LICT Corporation; Jimmy Todd of Nex-Tech; Greg Reed of Wheat State Technologies; Kristi Lee of Valley Telecom Group; Jim Meyers of Penasco Valley Telephone Cooperative, Inc.; Eric Votaw of Varcomm Holding, Inc.; Sara Yocum of Calaveras Telephone Company; and Mike George of Pelican Broadband. Also attending the meeting were Derrick Owens and Steve Goodman from WTA.

During the meeting, the WTA staff and members generally discussed various issues regarding the difficulties and concerns relating to the deployment of broadband services in WTA members’ rural territories. WTA members explained the ramifications of the uncertainty surrounding future USF high-cost payments in light of the pending Supreme Court review of the 5th Circuit Consumers’ Research decision, as well as the potential impact of the 2025 E-ACAM true up on model-based carriers and the potential effects the budget control mechanism may have on CAF-BLS carriers. WTA members additionally raised the need for addressing both USF contribution and distribution reform. The current contribution factor is above 36% and is unsustainable, and therefore the Commission should look to assess BIAS providers and work with Congress to have edge providers and others who should be contributing to USF do so in order to bring the contribution factor down and be spread equitably among all users. On the payment to carriers’ side, the companies are required to expend significant amounts of money for things like cybersecurity, but the current cost support mechanisms do not include compensation for those costs. We also addressed the amicus brief we filed with the Supreme Court last month, which explained the devastating impact of a decision upholding the 5th Circuit *en banc* opinion.

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Because some of the matters raised during the meeting addressed issues that are encompassed in the above-captioned Commission proceedings, pursuant to Section 1.1206(b) of the Commission's Rules, this submission is being filed for inclusion in the public record of those proceedings.

Respectfully submitted,

WTA – ADVOCATES FOR RURAL BROADBAND

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/s/ Stephen L. Goodman

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