

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Connect America Fund)	WC Docket No. 10-90
)	
Alaska Connect Fund)	WC Docket No. 23-328
)	
Connect America Fund—Alaska Plan)	WC Docket No. 16-271
)	
Universal Service Reform—Mobility Fund)	WT Docket No. 10-208
)	
ETC Annual Reports and Certifications)	WC Docket No. 14-58
)	
Telecommunications Carriers Eligible to Receive Universal Service Support)	WC Docket No. 09-197

REPLY COMMENTS
OF
WTA – ADVOCATES FOR RURAL BROADBAND

WTA – Advocates for Rural Broadband (“WTA”) is submitting brief reply comments in response to the Commission’s Further Notice of Proposed Rulemaking in this proceeding.¹ WTA is a national trade association representing approximately 400 rural local telecommunications carriers. The typical WTA member company serves fewer than 5,000 customers per service area and has fewer than 50 employees. WTA’s members provide voice, broadband and other services to some of the most remote, rugged, sparsely populated, and expensive-to-serve areas of the United States. These conditions that WTA members face are magnified and exacerbated in Alaska by the shortened construction season, making deployment of advanced services particularly challenging. As a result, the Commission must incorporate a fair degree of

¹ *Connect America Fund, et al.*, Report and Order and Further Notice of Proposed Rulemaking, FCC 24-116 (rel. Nov. 4, 2024) (hereafter cited as “*Further NPRM*”).

flexibility tailored to the circumstances of the service providers into whatever support program ultimately is adopted for Alaska.

However, WTA agrees with the commenters that suggest that it would be premature for the Commission to try to design a subsidy program for the Alaska Connect Fund in light of all of the presently unknown conditions that will affect deployment.² The necessary maps to understand the areas that will need support and the extent of that support have not yet been finalized. Moreover, there are significant synergies between deployment of fiber broadband networks to serve fixed locations and the deployment of facilities to support mobile services, because fiber broadband service might be readily extended to wireless towers to provide necessary backhaul (and middle mile) service. But the BEAD program, with over \$1 Billion in funding for Alaska,³ has yet to be implemented.⁴ As a result, the extent of additional fiber deployment in Alaska is also unknown. It is difficult to design the most efficient solution when the nature and extent of the problem has not yet been determined, and may not be for some time.

Finally, WTA appreciates the efforts of OptimERA Holdings, Inc. (“OptimERA”) to suggest an “out of the box thinking” approach for addressing some of the issues raised in the *Further NPRM*. Unfortunately, its proposal is overly complicated, with features like reducing assistance in areas with multiple providers until only one competitor remains,⁵ and mandated

² See, Alaska Telecom Association Comments at pp. 7-9; GCI Communication Corp. Comments at p. 2.

³ See, <https://www.ntia.gov/funding-programs/internet-all/broadband-equity-access-and-deployment-bead-program/program-documentation/state-allocation-totals>.

⁴ See, <https://www.internetforall.gov/bead-progress-dashboard>.

⁵ See, OptimERA Comments at pp. 12-15.

roaming accompanied by rate regulation (on a “voided cost-plus basis”⁶). Even OptimERA concedes that their “proposed plan is novel and requires analysis and technical implementation to work.”⁷ Such a mechanism would also require the Commission and the service providers to expend significant time and resources to develop, implement and enforce these procedures. But even more critically, these proposed mechanisms would not furnish service providers with the degree of certainty necessary to support long-term investments. As ATA recognized in its

Comments:

[S]uccessful implementation of broadband deployment programs in Alaska, even more than in the lower 48 states, will depend on sustainable, predictable, ongoing funding for the operation and maintenance of networks once deployed, given the unusually high costs of maintenance, greater wear and tear, and lower revenue potential involved in serving the state. Without reliable ongoing support, the Commission cannot ensure that Alaskans will have access to services that are reasonably comparable to those in the contiguous U.S.⁸

For all these reasons, WTA urges the Commission to reject the “novel” proposal put forth by OptimERA.

Respectfully submitted,

WTA – ADVOCATES FOR RURAL BROADBAND

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⁶ See, OptimERA Comments at p. 14.

⁷ OptimERA Comments at p. 17.

⁸ ATA Comments at p. 6.