

September 18, 2025

VIA ECFS

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

**RE: Inquiry Concerning Deployment of Advanced Telecommunications Capability to All
Americans in a Reasonable and Timely Fashion; GN Docket No. 25-223**

Dear Ms. Dortch:

On Wednesday, September 17, 2025, Derrick Owens and Stephen Goodman of WTA – Advocates for Rural Broadband (“WTA”), along with James Wescott – CEO, Cambridge Telephone Company; Jerry Piper – COO, Cambridge Telephone Company (Idaho); Jonathan Cannon – Government Affairs/Special Projects, Rally Networks (Oregon, Idaho, Missouri, Arkansas, Oklahoma, and Washington); JD Bennetts – CEO/GM, Custer Telephone Co-op; and Sherry Maestas – CFO, Custer Telephone Co-op (Idaho), met with Harsha Mudaliar, Policy Advisor to Commissioner Gomez, to discuss generally these rural companies’ operations and success in deploying broadband service to their customers. The WTA members highlighted the fact that without a strong and stable universal service fund program that none of the work they have been able to do in providing telephone service and now high-quality broadband would have been possible due to the remoteness and lack of population density in the communities they serve. Because some of these WTA members use both fiber and wireless service to provide links to their customers, they explained how the carriers decide to replace their fixed wireless with fiber broadband and what were the determining factors for such upgrades. In addition, we addressed WTA’s recently-filed comments in the Section 706 Notice of Inquiry proceeding, and explained why the Commission should continue to assess progress towards both a near-term and a long-term benchmark. We also explained how LEO satellite service should be part of that analysis, but that as part of the review the Commission must also consider the limitations resulting from the dynamic sharing of spectrum amongst a LEO satellite system’s customers, as well as spectrum sharing between LEO satellite systems. Finally, we explained that considering the differences in technical capabilities of different technologies is consistent with technological neutrality.

Respectfully submitted,

WTA – ADVOCATES FOR RURAL BROADBAND

/s/ Stephen L. Goodman
Regulatory Counsel
400 Seventh Street NW, Suite 406
Washington, DC 20004
Phone: (202) 607-6756

cc: Harsha Mudaliar