

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of	)	
	)	
Reforming the High-Cost Program for an All-IP Future	)	WC Docket No. 26-96
	)	
Connect America Fund: A National Broadband Plan for our Future High-Cost Universal Support	)	WC Docket No. 10-90
	)	
	)	

**REPLY COMMENTS
OF
WTA – ADVOCATES FOR RURAL BROADBAND**

WTA – ADVOCATES FOR RURAL BROADBAND

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SUMMARY

In its initial comments in this proceeding WTA described how the long history of support for rural service providers was made explicit in the Telecommunications Act of 1996. Congress specifically directed the Commission in Section 254(b)(3) to ensure that rates and services in rural areas shall be reasonably comparable to those in urban areas. And in Section 254(b)(5) Congress specified that universal service support shall be specific, predictable and sufficient. WTA also explained that the High Cost Program under review in this proceeding is one of many support mechanisms, but it remains critical to meeting those Section 254 principles, both with regard to deployment and ongoing operations and maintenance.

In contrast, some of the commenters contend that the Commission can eliminate or significantly reduce high-cost support based on claims that service has already been deployed to all locations, the marketplace can solve the problem, and/or BEAD will solve the problem. Other commenters made impractical or unwise proposals. WTA responds in these Reply Comments to these various commenters' arguments.

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Comments of WTA – Advocates for Rural Broadband

WTA – Advocates for Rural Broadband (“WTA”) submits these Reply Comments in response to some of the initial comments addressing the Commission’s questions concerning whether or how the high-cost program ought to be modified or updated in light of marketplace and technology developments, as well as the impending end of the initial ACAM term. WTA believes the record overwhelmingly supports the need for continuing Universal Service Fund support to adhere to Congress’ directives to the Commission in Section 245 – to ensure that rates and services in rural areas are reasonably comparable to rates and services in urban areas, and that support should be specific, predictable and sufficient. Any claims that the Commission should eliminate high cost support as no longer necessary support are not well-founded.

SpaceX

Space Exploration Technologies Corp. (“SpaceX”) was one of the parties that claimed the deployment mission has already been accomplished, rendering the High-Cost program unnecessary. According to SpaceX:

The Commission’s High-Cost universal service programs have outlived their purpose. Designed for an era when rural Americans faced a stark market failure, these subsidies now prop up legacy providers in markets where unsubsidized competition already thrives. Today, high-speed, low-latency broadband is ubiquitously available across the United States through next-generation satellite networks.¹

However, as WTA explained in its initial comments, LEO satellite service is not “unsubsidized.” Starlink and Amazon LEO are slated to receive BEAD funding. And potentially even more significant, LEO satellite systems are not required to pay the federal government for their spectrum licenses at auctions like the terrestrial mobile service providers do.² Indeed, Chairman Carr at the press conference following the Commission’s recent August 6th meeting explained that the FCC licenses broadcasters receive for free amount to a subsidy.³

As for the claims that “high-speed, low-latency broadband is ubiquitously available across the United States through next-generation satellite networks,” WTA previously explained in its initial comments why the capacity constraints would slow down service, which

¹ SpaceX Comments at p. 1. *See also*, SpaceX Comments at p. 10 (“The High-Cost programs were built for a world that innovation has left behind. Unsubsidized competition—led by ubiquitous high-speed satellite broadband—has delivered the connectivity these subsidies were meant to provide, rendering continued support wasteful and counterproductive.”). The SpaceX Comments makes similar claims about ubiquitous coverage by unsubsidized competitors at pp. 2, 5, and 7 of its Comments.

² Indeed, to date those terrestrial wireless carriers have paid over \$200 billion to the U.S. Treasury at the Commission’s spectrum auctions. And as SpaceX itself notes at pp. 5-6 of its Comments, that amount of spectrum auction revenues is poised to increase even more in the very near future: “The Commission promoted expanded wireless service by auctioning AWS-3 spectrum, moving quickly to auction 180 MHz of valuable C-band spectrum, and enabling new unlicensed services.”

³ Brendan Carr, Chairman, FCC, Remarks at Press Conference (Aug. 6, 2026). The discussion occurs at the 1 hour and 22 minutes mark of the Commission recording of the August 6 meeting and press conferences following that meeting, available online at <https://www.fcc.gov/August2026>.

even presently do not provide “median speeds” of 100/20 Mbps in more than half the states.⁴

And “median speeds” do not meet the Commission’s more stringent requirement of 80% of the peak period tests surpassing 80% of the required download and upload speeds. Furthermore, in addition to the capacity constraints imposed by intra-system sharing, the satellite spectrum must also be shared with other licensed LEO satellite systems, and as the SpaceX Comments themselves noted:

Moreover, satellite broadband competition is expected to ramp up quickly, as Amazon Leo stated that it intends to initiate commercial service in 2026. Meanwhile, Logos received authorization to deploy a 4000 satellite next-generation broadband system, and Blue Origin applied for authorization for 5400 satellite broadband system.⁵

While WTA recognizes LEO satellite service can complement terrestrial fiber service (and may be a way to address the extremely high-cost locations), LEO satellite service has not rendered

⁴ Indeed, the article that SpaceX cited in fn. 3 of its Comments also indicated “Starlink users in 22 states were able to get median upload speeds of 20 Mbps or higher, an improvement over the 2H of 2024 when users in no states were able to get 20 Mbps in upload speeds. This is a significant milestone because the FCC designates 20 Mbps upload speeds as the minimum threshold for broadband connectivity.” And as the Commission noted in its recent Section 706 Report to Congress, Docket No. 25-223, FCC 26-55, released August 14, 2026 at fn. 5:

While satellite service is widely deployed, its usability may be limited by certain factors or during certain periods of time, resulting in slower speeds and higher latency in remote areas. *See, e.g.*, Sacha Meinrath et al., X-Lab, [Starlink Capacity Analysis v0.2 \(July 28, 2025\)](https://thexlab.org/wpcontent/uploads/2025/07/Starlink_Analysis_Working_Paper_v0.2.pdf), https://thexlab.org/wpcontent/uploads/2025/07/Starlink_Analysis_Working_Paper_v0.2.pdf (Starlink Capacity Analysis v0.2); Omar Gallaa, CNET, Some Starlink Customers Report Getting Hit With Massive Demand Surcharge (July 15, 2026), <https://www.cnet.com/tech/services-and-software/starlink-customers-report-demand-surcharges/> (July 2026 CNET Starlink Surcharge); Starlink, What is a Demand Surcharge?, <https://starlink.com/sb/support/article/63d885d3-c269-21f9-69d6-3ed1b2fd18e9> (last visited Aug. 11, 2026) (Starlink Demand Surcharge Webpage); Starlink, Starlink Specifications, <https://starlink.com/legal/documents/DOC-1470-99699-90> (last visited Aug. 11, 2026) (Starlink Specifications).

⁵ SpaceX Comments at p. 4.

the high cost support programs superfluous, because those USF programs are necessary to ensure that *robust* and *reliable* broadband are extended to rural locations where they are still not available, and to ensure that the rural networks that have already been deployed can be operated and upgraded as needed, while still ensuring that the rates for those services remain reasonably comparable to urban rates.

SpaceX also suggests that the public would be better served by the Commission focusing its attention and resources on affordability instead of supporting terrestrial broadband services in rural areas.⁶ WTA agrees that affordability is an important policy – indeed, Congress thought so, too, in specifying in Section 254(b)(3) that both rates and services in rural areas should be comparable to rates and services in urban areas. WTA acknowledges that the Commission’s Lifeline program is under-resourced. But that reflects its historic origins in the mid-1980’s as an offset to the newly-implemented Subscriber Line Charges.⁷ Congress more recently created the Affordable Connectivity Program (“ACP”) during the pandemic as a way of allocating significantly greater resources to making broadband affordable to poor households,⁸ but WTA is unaware of any efforts by SpaceX to lobby Congress to extend ACP

⁶ E.g., SpaceX Comments at pp. 1-2:

Meanwhile, the Lifeline program that addresses the largest remaining barrier to broadband adoption and use—affordability—is badly under-resourced, receiving roughly a fifth as much funding as the High-Cost programs. SpaceX urges the Commission to wind down and sunset these counterproductive High-Cost programs and reallocate those resources to programs that will have a meaningful impact or reduce the contribution burden on consumers.

See, also, SpaceX Comments at pp. 7-10.

⁷ *MTS and WATS Market Structure, and Amendment of Parts 67 & 69 of the Commission’s Rules and Establishment of a Joint Board*, CC Docket Nos. 78-72, 80-286, Report and Order, 50 Fed. Reg. 939 (1985).

⁸ Congress adopted the program in Title V. of the Infrastructure Investment and Jobs Act.

funding after it ran out. SpaceX's newfound concern for affordability and the Lifeline program seems more than a little insincere, particularly as it is raising its own rates presently.⁹

WTA does agree with SpaceX that a USF Contribution Factor approaching 40% is problematic.¹⁰ But given the continuing need for high-cost support, the answer is not eliminating that funding. Rather, as WTA explained in its initial comments, the problem can better be addressed through USF Contribution reform, because the 1983 decision to exempt "enhanced services" from contributions to protect an "infant industry" no longer makes any sense when Internet services now make up the vast majority of traffic on the networks.¹¹

ITIF

The Information Technology and Innovation Foundation ("ITIF") was one of the other parties that claimed there was no longer a need for the ACAM, CAF BLS and HCLS programs.

ITIF asserted that:

The Commission should eliminate legacy high-cost support mechanisms and allow A-CAM support to expire without extension. These programs have achieved their original objectives, while changes in the broadband marketplace have substantially reduced the policy rationale for continuing them. ... The Connect America Fund Broadband Loop Support (CAF BLS) and High-Cost Loop Support (HCLS) continue to provide cost-based operating-expense (op-ex) support to rate-of-return carriers rather than tying support to forward-looking deployment obligations. These mechanisms warrant reconsideration because they provide continuing operational support to carriers whose economic viability may depend on federal subsidies rather than sustainable market demand.¹²

⁹ <https://thenextweb.com/news/starlink-price-increase-standby-mode-roam-residential>.

¹⁰ SpaceX Comments at p. 9.

¹¹ WTA Comments at pp. 4-5.

¹² ITIF Comments at p. 2. *See also*, ITIF Comments at p. 3:

The result of the proliferation of substitutable services is greater competition in the broadband marketplace, as shown by declining consumer prices and extensive promotions, including service bundles. Nevertheless, one industry survey estimated that

ITIF's claims are wrong on many levels. The objectives of these programs remain unfulfilled. These subsidy programs were intended to meet the goals of Section 254(b)(3), and without them the rates in rural areas would be substantially higher than rates in urban areas. In addition, many of WTA's members have used the funding to help deploy fiber optic networks, thus also helping to provide comparable services. But there are still areas where further investment will be necessary both to deploy new broadband networks and to upgrade already-deployed broadband networks,¹³ as well as the continuing need to help offset the significantly higher operating costs of providing service in low-density rural areas on a per subscriber basis. With regard to ITIF's assertion of changes in the broadband marketplace and its particularly pointing to LEO satellite service,¹⁴ WTA in its initial comments explained in detail why the expansion of low-Earth orbit satellite service has not been proven to provide a robust, reliable long-term solution.¹⁵

WTA also takes issue with ITIF's suggestion that "sustainable marketplace demand" should be the appropriate measure of the need for broadband service in rural areas. In enacting Section 254 as part of the 1996 Telecommunications Act, Congress recognized that the

recipients of legacy High-Cost support would need to charge nearly \$165 per month on average absent support, compared with a median monthly price of \$63 across a sample of 250 service plans. This disparity suggests that legacy support mechanisms subsidize carriers that cannot compete on merit, rather than filling a genuine service gap." (citations omitted)

¹³ As Congress decreed in Section 254(c)(1): "Universal service is an evolving level of telecommunications services that the Commission shall establish periodically under this section, taking into account advances in telecommunications and information technologies and services."

¹⁴ ITIF Comments at p. 4.

¹⁵ See, WTA Comments at pp. 17-23.

marketplace does not account for the positive externalities of robust broadband service in rural areas.¹⁶ As USTelecom observed in its initial comments as to why it makes sense to subsidize fiber deployment rather than just relying on LEO satellite broadband service:

Additionally, investment in fiber infrastructure produces lasting economic benefits that extend well beyond broadband availability. Fiber deployment creates durable community assets that attract employers, support entrepreneurship, increase property values, strengthen educational opportunities, improve health care delivery, and enhance public safety communications. In addition, fiber infrastructure serves as essential middle-mile and backhaul facilities supporting wireless carriers, public safety networks, and future communications technologies. These broader economic and public-interest benefits distinguish fiber from technologies designed primarily to provide retail broadband connectivity. Consequently, fiber offers a more scalable and future-proof platform capable of meeting continually increasing bandwidth demands.¹⁷

WTA additionally disagrees with ITIF's suggestion that:

The Commission should allow the programs to expire according to their existing terms, which would be consistent with their original design and would avoid converting time-limited support into an open-ended commitment.¹⁸

The “original design” of the ACAM program was to provide rural carriers with an opportunity to elect to receive model-based support for an initial term of ten years, paired with an obligation to meet defined build-out obligations.¹⁹ The Commission decision adopting the ACAM program also indicated that:

In year eight, we expect the Commission will conduct a rulemaking to determine how support will be determined after the end of the 10-year period. We expect that prior to the end of the 10-year term, the Commission will have adjusted its minimum broadband

¹⁶ And more recently, Congress recognized such positive externalities in defining “priority broadband projects” in the BEAD program. IIJA § 60102(a)(1)(I).

¹⁷ USTelecom Comments at p. 14. *See, also*, NTCA Comments at pp. 7-16; WTA Comments at p. 17.

¹⁸ ITIF Comments at p. 4.

¹⁹ *Connect America Fund; ETC Annual Reports and Certifications; Developing a Unified Inter-carrier Compensation Regime*, 31 FCC Rcd 3087 (2016).

performance standards for all ETCs, and other changes may well be necessary then to reflect marketplace realities at that time.²⁰

Moreover, as ITIF indicated later in its comments, “[a]ny recalibration should account for reliance interests, contractual obligations, and litigation risk.”²¹ And in the case of ACAM and the HCF and HCLS programs, there was a reasonable expectation that support should continue, particularly in light of Congress’ admonition in Section 254(b)(5) that “There should be specific, predictable and sufficient Federal and State mechanisms to preserve and advance universal service.” Indeed, WTA’s members took out long-term loans from the Rural Utility Service and other programs in reliance on continuing high cost support. Any reduction in support could have material adverse consequences for debt repayment, continued investment, maintenance, rates, and the long-term effectiveness of federal lending programs intended to promote rural broadband deployment.

Finally, WTA also disagrees with ITIF’s suggestion that the Commission should re-purpose USF support presently going to rural service providers to instead provide support directly to consumers to help ensure affordability.²² In making that argument, ITIF claims that

²⁰ *Ibid* at ¶ 22. In contrast, in connection with the later-developed Rural Digital Opportunity Fund (“RDOF”) program, the Commission made clear up front that there was to be no expectation of support beyond the 10-year term:

We do not agree that adopting a 10-year term risks funding unsustainable projects, as one commenter suggests, because we expect bidders to seek sufficient support to build and maintain their network without an expectation of ongoing support after the 10-year support term expires.” (citation omitted)

FCC Launches \$20 Billion Rural Digital Opportunity Fund To Expand Rural Broadband Deployment, 35 FCC Rcd 686 (2020) at ¶ 7.

²¹ ITIF Comments at p. 8.

²² ITIF Comments at pp. 4-5.

such a policy would better support a policy of “technology neutrality.” As WTA explained in its initial comments, “technology neutral” should not mean treating all technologies as equivalent.²³ Moreover, affordability is certainly important – but it is also essential that robust and reliable services reasonably comparable to services in urban areas be deployed and available to rural customers. And the Commission’s USF support to rural carriers has -- and should continue to provide -- funding for deployment of robust, reliable and scalable broadband service in rural America. The Commission’s USF deployment and affordability programs should be viewed as complements to each other, not competitors for universal service support funding. Simply relying on LEO satellite broadband for customers in rural areas would relegate those households and farms to an inferior service compared to fiber, while also limiting the positive externalities of supporting precision agriculture, telehealth, remote education and wireless backhaul.

NCTA, INCOMPAS and WISPA

WTA likewise disagrees with several of the positions reflected in the comments submitted by NCTA – The Internet & Television Association (“NCTA”). NCTA proposes to allow the CAF BLS and HCLS support to be phased down or substantially reduced and to just let the various ACAM programs to expire.²⁴ As explained above, such an argument ignores the ongoing need for high cost support to help fund new deployment and upgrades, as well as address the higher per subscriber operating costs in rural areas, consistent with the Section 254(b)(3) directive to the Commission to ensure that rates and services in rural areas be reasonably comparable to the rates and services in urban areas. NCTA’s reliance on the mere

²³ WTA Comments at p. 16.

²⁴ NCTA Comments at pp. 2 and 6-7.

possibility of BEAD or some other program potentially funding ACAM carrier locations lacking adequate service²⁵ does not adequately address the Section 254(b)(3) requirements.

WTA also has concerns with NCTA's suggestions with how to treat locations where there may be a competitive provider.²⁶ NCTA would have the Commission rely on the National Broadband Map to determine whether a provider was offering a qualifying competitive service. But service being shown as "available" on the national broadband map is not necessarily an indication that a qualifying service can actually be provided. WTA's members have experienced significant problems with National Broadband Map, including overstated service availability and speed claims, as well as problems with the Commission's challenge process. In addition, the map shows advertised service speeds – which is not necessarily the level of service that can reliably be provided. At the very least, reliance on the National Broadband Map should be accompanied by an efficient and effective challenge process, along with robust performance measurement obligations. In addition, as WTA explained in its comments, any reduction in support to rural service providers must only reflect the incremental savings of no longer having to provide service to that location.²⁷

²⁵ NCTA Comments at p. 4:

Finally, because A-CAM carrier locations that did not elect Enhanced A-CAM may be eligible for support through BEAD or other deployment programs, the Commission should allow the remaining A-CAM programs due to expire within the next few years to sunset on schedule, beginning with A-CAM I at the end of 2026.

²⁶ NCTA Comments at pp. 5-6.

²⁷ WTA Comments at pp. 15-16. *Cf.*, INCOMPAS Comments at p. 9:

At a minimum, the Commission should adjust CAF BLS calculations or associated obligations, as appropriate, to prevent duplicative recovery for deployment or service obligations already funded through BEAD or another public program, while accounting for distinct and demonstrated costs of maintaining and operating existing facilities. (citation omitted)

Finally, WTA responds to NCTA's assertion that "[t]he Commission, therefore, should not presume, without supporting evidence, that rural providers operating modern fiber or fiber-rich networks cannot recover their reasonable operating expenses through customer revenues."²⁸ While operating costs may be lower for fiber networks compared to copper networks, there is still the problem of very low densities, thus still making the per subscriber costs unaffordable if recovered strictly from subscriber charges. In addition, the demand by data centers for fiber and electronics has made those components more expensive, and there are also likely to be higher interconnection/transit costs, as well as costs incurred in meeting cybersecurity obligations.

WTA also disagrees with a few of the proposals put forth by INCOMPAS, although we agree with other portions of their comments.²⁹ INCOMPAS proposes very detailed analyses and calculations to determine appropriate support amounts.³⁰ WTA's concern is that the required data collection and analyses would be very burdensome, and would necessarily involve difficult (and potentially arbitrary) cost allocation issues.³¹ WTA also disagrees with

²⁸ NCTA Comments at p. 7. *Cf.*, NCTA Comments at n. 17: "NCTA recognizes that in certain locations with particularly challenging terrain, such as Alaska, operational support may be necessary." WTA notes that many rural providers' territory includes particularly challenging terrain, not just in Alaska.

²⁹ In particular, WTA agrees with the INCOMPAS Comments with regard to the need to broaden the USF contribution base (pp. 3-4); the correct interpretation of "technology neutral" (pp. 11-12); and the need to carefully evaluate LEO satellite capabilities and performance (p. 12).

³⁰ INCOMPAS Comments at pp. 6-8.

³¹ *E.g.*, INCOMPAS Comments at pp. 7-8:

To fill any material gaps, supplemental collection should be targeted, standardized, and limited to information directly relevant to support eligibility or amount. The Commission may require information concerning actual and prudent operating and

INCOMPAS’ proposal “to use competitive bidding wherever practicable to identify the provider that can satisfy the defined deployment, service, affordability, maintenance, performance, and public interest obligations at the lowest support level consistent with those requirements.”³² WTA has concerns with such a procedure, based on the experiences with the RDOF and BEAD “Benefit of the Bargain” round, which tended to result in the selection of the cheapest solution, not necessarily the best bargain. Moreover, the significant number of RDOF defaults also cautions against use of such reverse auctions.³³

Finally, WTA has concerns with a few of the proposals in the comments filed by WISPA – *The Association for Broadband Without Boundaries* (“WISPA”). WISPA asserts that “[i]f there is a basis to maintain support for recipients of the legacy programs, the Commission should adopt a single fixed-support program with support levels determined through a new cost model.”³⁴ WTA in its initial comments raised concerns with suggestions

maintenance expenses; customer revenues and adoption; shared network costs; transport, power, cybersecurity, and workforce expenses; debt service associated with supported infrastructure; necessary replacement and upgrade investment; network technology and architecture; competitive conditions; and the documented use of existing support and likely consequences of reducing or withdrawing it. These factors should be evaluated together rather than treating any single financial measure as dispositive. The Commission should avoid duplicative reporting, make maximum use of existing submissions, protect competitively sensitive information from inappropriate public disclosure, and account for the compliance resources of small providers.”

³² INCOMPAS Comments at p. 9. *See also*, INCOMPAS Comments at pp. 9-11.

³³ According to a study performed by the Benton Institute for Broadband and Society (“Benton Institute”), over 36% of the locations and slightly under 36% of the revenues awarded in the RDOF auction were defaulted as of January, 2025 (<https://www.benton.org/headlines/rdofdefaults>). And subsequent to that Benton Institute analysis, the Commission announced additional RDOF defaults: <https://docs.fcc.gov/public/attachments/DA-25-45A1.pdf>; <https://docs.fcc.gov/public/attachments/DA-25-484A1.pdf>; <https://docs.fcc.gov/public/attachments/DA-25-670A1.pdf>.

³⁴ WISPA Comments at p. 3.

that the Commission might mandate use of a single cost model, given the fact that half its members had rejected previous model offers for various reasons, thus undercutting the suitability of a mandatory model-based support program. To the extent WISPA is advocating a single, mandated-cost model, WTA would question the wisdom of such an approach.

WISPA also contends in its comments that:

Any new program should not favor any particular terrestrial technology. At any given location, and subject to the non-feasibility exception discussed below, recipients should be permitted to deploy the terrestrial technology that they choose so long as they can demonstrate the capability to meet the Commission’s performance requirements.

WTA appreciates an approach to “technology neutral” that does not simply contend that all broadband technologies are the same. However, it is very important that the Commission-specified “performance requirements” be properly defined so that the broadband technology that get selected is not soon rendered insufficiently robust and reliable as demand for greater speeds or capabilities develop. It makes little sense to invest USF support on networks that are already or will soon be obsolete. Thus, the performance requirements must reflect the speeds, reliability and latency to meet current and expected needs of critical rural applications, including NG911, telehealth, remote education and precision agriculture. And it should also include scalability, given the expectation of the importance of Artificial Intelligence applications.³⁵

³⁵ Indeed, Congress recognized the importance of scalability when it defined a “priority broadband project” for purposes of the BEAD program:

(I) PRIORITY BROADBAND PROJECT.—The term “priority broadband project” means a project designed to—
(i) provide broadband service that meets speed, latency, reliability, consistency in quality of service, and related criteria as the Assistant Secretary shall determine; and
(ii) ensure that the network built by the project can easily scale speeds over time to— (I) meet the evolving connectivity needs of households and businesses; and (II) support the deployment of 5G, successor wireless technologies, and other advanced services.

In sum, WTA believes the record as a whole establishes that the public interest will best be served by a USF broadband support program that reflects the fact that the nation as a whole benefits when everyone, including homes and businesses in rural America, is connected via robust and reliable modern communications services at affordable rates. While we have made great progress in meeting that goal, this will continue to be an ongoing project, and the job is not done yet. Indeed, unjustified high cost support reductions could create stranded investment, loan distress, higher rural rates, deferred maintenance, reduced facilities-based competition, and a less resilient national communications infrastructure. And once terrestrial broadband infrastructure is weakened or lost, rebuilding it may prove far more difficult and expensive than preserving it today.

Respectfully submitted,

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