



March 24, 2021

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; Rural Digital Opportunity Fund, WC Docket No. 19-126; Auction 904, AU Docket No. 20-34; Universal Service Contribution Methodology, WC Docket No. 06-122; Emergency Broadband Benefit Program, WC Docket No. 20-445; Expanding Broadband Service Through the ACAM Program, RM No. 11868*

Dear Ms. Dortch:

On Tuesday, March 23, 2021, Shirley Bloomfield, Chief Executive Officer of NTCA–The Rural Broadband Association (“NTCA”), and the undersigned spoke with Acting Chairwoman Jessica Rosenworcel and Ramesh Nagarajan, her acting wireline legal advisor, regarding matters in the above-referenced proceedings.

First, consistent with prior advocacy, NTCA urged the Federal Communications Commission (“Commission”) to adopt procedures to enhance transparency and accountability in consideration of Rural Digital Opportunity Fund long-form applications consistent with NTCA’s previously submitted recommendations in these proceedings. *See, e.g., Ex Parte* Letter from Michael R. Romano, Sr. Vice President, NTCA, to Acting Chairwoman Jessica Rosenworcel, Commission, WC Docket No. 10-90, *et al.* (filed Feb. 5, 2021).

Second, NTCA discussed the pressing need for action on several important measures related to universal service fund (“USF”) support received by smaller rural operators. Specifically, NTCA renewed its request for the Commission to waive the application of the budget control mechanism to certain kinds of USF support in the face of challenges brought on by the pandemic, especially in light of providers’ increased efforts to deploy broadband to customers lacking connectivity during this crisis. *See, e.g., Ex Parte* Letter from Michael R. Romano, Sr. Vice President, NTCA, to Marlene H. Dortch, Secretary, Commission, WC Docket No. 10-90 (filed May 7, 2020). Similarly, NTCA reiterated support for the Commission to take prompt action on the petition submitted by the ACAM Broadband Coalition to update, enhance, and expedite deployment obligations for certain providers in exchange for several years of additional support. *See* Petition for Expedited Rulemaking of the ACAM Broadband Coalition, RM No. 11868 (filed Oct. 30, 2020).

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Third, NTCA discussed the need for review and action with respect to the USF contributions mechanism. NTCA observed that problems with the contribution factor (particularly the striking and accelerating decline in assessable revenues) put at risk the stability and effectiveness of all four essential USF programs. Consistent with a prudent and prescient congressional mandate that USF support be specific, predictable, and sufficient, NTCA therefore urged the Commission to consider measures to stabilize the contributions factor and put its critical USF programs on a more solid foundation for the future. 47 U.S.C. § 254(b)(5).

Finally, NTCA discussed its members' potential involvement in the pending Emergency Broadband Benefit program. Based upon discussions with members to date, NTCA anticipates a sizeable level of interest and participation in the program by smaller rural providers. NTCA encouraged the Commission to consider promoting opportunities for participation by such providers through the publication of "small business" guidance to help them in navigating their own enlistment in the program, their communications with consumers (through such tools as sample notices and disclosures), and compliance otherwise with ongoing program requirements.

Thank you for your attention to this correspondence. Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS.

Sincerely,

/s/ Michael R. Romano

Michael R. Romano

Senior Vice President –

Industry Affairs & Business Development

NTCA–The Rural Broadband Association

cc: Acting Chairwoman Jessica Rosenworcel
Ramesh Nagarajan