

June 11, 2024

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

Re: *Ex Parte Communication: Connect America Fund. WC Docket No. 10-90; ETC Annual Reports and Certifications WC Docket No. 14-58; Telecommunications Carriers Eligible to Receive Universal Service Support WC Docket No. 09-197; Connect America Fund – Alaska Plan; WC Docket No. 16-271; Expanding Broadband Service Through the A-CAM Program, RM-11868*

Dear Ms. Dortch:

In a January 25, 2024 Public Notice providing guidance on how the Enhanced Alternative Connect America Cost Model (E-ACAM) program adjustment process would be conducted,¹ the Wireline Competition Bureau indicated that it plans to use Version 4 of the Fabric, as modified by successful challenges to location data submitted by March 8, 2024.² In doing so, it stated its determination that the Version 4 dataset “best represents the locations that existed at the time the offers were made.”³

The undersigned entities support the use of Fabric Version 4 in the adjustment process to identify broadband serviceable locations (BSLs) to which deployment may be required.⁴ However, the use of Fabric Version 4 necessitates the adoption of a mechanism to assign a cost to those BSLs contained in Fabric Version 4 that the model has not assigned a cost to because they are located in E-ACAM company census blocks that did not contain any BSLs in Version 2 of the Fabric. The undersigned entities propose that the Bureau use the model-provided cost of a nearby BSL in the E-ACAM company’s study area to assign a cost to an uncosted BSL. The process we propose is described in more detail below.

1. If the nearest BSL in an E-ACAM company’s study area for which the model has provided a cost is one airline mile or less from the E-ACAM company’s uncosted

¹ *Wireline Competition Bureau Announces Guidance Regarding Locations and Broadband Coverage for Enhanced Alternative Connect America Cost Model Mechanism*, WC Docket No. 10-90, DA 24-78, Public Notice (rel. Jan. 25, 2024) (“*January 25th Public Notice*”).

² *Id.* at 2.

³ *Id.* (footnote omitted).

⁴ See Letter from NTCA- The Rural Broadband Association, ACAM Broadband Coalition, USTelecom – the Broadband Association, and WTA – Advocates for Rural Broadband to Marlene H. Dortch, WC Docket No. 10-90, et al. (filed Apr. 3, 2024) at 2.

BSL, the Bureau will assign a cost to the uncosted BSL equal to the model-provided cost of the nearest BSL in the E-ACAM company's study area.

2. If the nearest BSL for which the model has provided a cost is more than one airline mile from the E-ACAM company's uncosted BSL, the Bureau will assign a cost to the uncosted BSL equal to the model-provided cost of the highest cost location in the census block group of the E-ACAM company's study area.
3. If there are no BSLs in the E-ACAM company's census block group for which the model has provided a cost, the Bureau will assign a cost to the uncosted BSL equal to the model-provided cost of the highest cost location in the census track of the E-ACAM company's study area.

We believe that the process described herein provides an equitable, simple to administer means to address this situation. We urge the Bureau to expeditiously adopt it and to work with stakeholders to expeditiously resolve outstanding challenges to mapping data so that this process can move forward based on more accurate and reliable data.

We are happy to answer any questions that may arise.

Respectfully submitted,

/s/ Genevieve Morelli
ACAM Broadband Coalition

/s/ Michael R. Romano
NTCA- The Rural Broadband Association

/s/ Diana Eisner
USTelecom – The Broadband Association

/s/ Derrick B. Owens
WTA – Advocates for Rural Broadband

cc: Suzanne Yelen
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