

December 18, 2017

The Honorable Ajit Pai  
Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

RE: *Connect America Fund*, WC Docket No. 10-90

Dear Chairman Pai,

Please find enclosed a letter from thirty-seven rural Iowa telecommunications companies requesting an increase in funding for the participants of the Alternative Connect America Model (A-CAM). This requested funding for the A-CAM plan will allow for a dramatic increase in broadband connectivity for the rural Iowan consumers who need it most.

I respectfully ask that you consider their concerns and take action before the end of the year to fund the A-CAM plan accordingly so that the opportunities and benefits that stem from broadband access can be enjoyed by more people who live in rural Iowa. I would also ask that you evaluate providing additional support for other universal service mechanisms to help better connect the people of Iowa.

Thank you for your time and attention to this crucial matter. If you or your staff have any questions, please contact Scott Stockwell from Representative Loeb'sack's staff at (202)-225-6576 or [scott.stockwell@mail.house.gov](mailto:scott.stockwell@mail.house.gov).

Sincerely,



Dave Loeb'sack  
Member of Congress

November 8, 2017

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Via ECFS

**Re: Ex Parte Communication, *Connect America Fund*, WC Docket No. 10-90**

Dear Ms. Dortch:

The 37 undersigned Iowa rural telecommunications companies<sup>1</sup> (“Iowa A-CAM Companies”) representing 45 study areas respectfully request the Federal Communications Commission (“Commission”) to allocate additional funding up to \$200/month per eligible customer location for all companies nationwide that voluntarily elected universal service funding under the Alternative Connect America Fund (“A-CAM”) model. In fact, Iowa is the state with the largest number of A-CAM-electing companies in the country, and the Iowa A-CAM Companies are already well under way with their deployment plans to meet the obligations laid out by the Commission.

Allocation of funding up to \$200/month per eligible location will reduce the locations designated “reasonable request” by 3,578 locations to only 2,632 locations. Furthermore, because of this funding, 2,615 additional locations in the state will receive service at 25/3 Mbps, while 2,453 additional locations will have increased service of at least 10/1 Mbps.

The Iowa A-CAM Companies point out that the Commission has already supported as Commission public policy A-CAM funding at \$200/month per location in the original rate-of-return carriers’ reform order.<sup>2</sup> Such an increase in funding will require no additional policy determinations by the Commission. Moreover, A-CAM Companies will be required to accept the additional buildout obligations under the conditions of the Order and Further Rulemaking issued in December 2016 should the Commission act by the end of 2017.<sup>3</sup>

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<sup>1</sup> The Iowa A-CAM Companies are listed in Attachment A.

<sup>2</sup> *Connect America Fund; ETC Annual Reports and Certifications; Developing a Unified Intercarrier Compensation Regime*, WC Docket Nos. 10-90 *et. Al.*, Report and order and Order on Reconsideration and Further Notice of Proposed Rulemaking, FCC 16-33 (rel. March 30, 2016).

<sup>3</sup> *Connect America Fund*, WC Docket No. 10-90, Report and Order and Further Notice of Proposed Rulemaking, FCC 16-178 (rel. Dec. 20, 2016).

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Granting of A-CAM funding at \$200/month per location will also result in a prudent use of the Commission's budget by enabling companies to design their networks in a more efficient manner at the outset without costly redesign. In addition, the costs of deploying broadband technology initially are less than the costs of installing interim solutions that will need to be replaced later.

On behalf of the thousands of customers they serve, the Iowa A-CAM Companies urge the Commission to act expeditiously and fund the A-CAM model at \$200/month per eligible location by December 31, 2017.

Sincerely,

The Iowa A-CAM Companies

Cc: Chairman Ajit Pai  
Commissioner Mignon Clyburn  
Commissioner Michael O'Rielly  
Commissioner Jessica Rosenworcel  
Commissioner Brendan Carr

Attachment A

**Attachment A**  
**Iowa A-CAM Companies**

Barnes City Cooperative Telephone Company  
Breda Telephone Corp.  
Butler-Bremer Mutual Telephone Company  
Coon Creek Telephone Company  
Center Junction Telephone Company, Inc.  
Coon Valley Cooperative Telephone Association, Inc.  
Cooperative Telephone Company  
Casey Mutual Telephone Company  
Danville Mutual Telephone Company  
East Buchanan Telephone Cooperative  
Farmers Telephone Company-Essex  
Farmers Mutual Cooperative Telephone Company-Harlan  
Farmers Mutual Telephone Company-Jessup  
Jefferson Telephone Company  
La Motte Telephone Company  
Lone Rock Cooperative Telephone Company  
Mechanicsville Telephone Company  
Modern Cooperative Telephone Company  
Martelle Cooperative Telephone Association  
Massena Telephone Company  
Mutual Telephone Company of Morning Sun  
Northwest Telephone Cooperative  
Northeast Iowa Telephone Company  
North English Cooperative Telephone Company  
New Ulm Telecom, Inc.  
Olin Telephone Company, Inc.  
Onslow Cooperative Telephone Association  
Rockwell Cooperative Telephone Association  
Sac County Mutual Telephone Company  
Schaller Telephone Company  
Superior Telephone Cooperative  
Templeton Telephone Company  
Terril Telephone Cooperative  
Titonka Telephone Company  
Van Buren Telephone Co., Inc.  
Western Iowa Telephone Association  
Wyoming Mutual Telephone Company



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

February 13, 2018

OFFICE OF  
THE CHAIRMAN

The Honorable Dave Loebsack  
U.S. House of Representatives  
1527 Longworth House Office Building  
Washington, D.C. 20515

Dear Congressman Loebsack:

Thank you for your letter on the importance of connecting additional rural consumers in Iowa to high-speed broadband. Your views are very important and will be entered into the record of our proceeding on the Connect America Fund and considered as part of the Commission's review.

In my first remarks to FCC staff as Chairman, I declared that my highest priority would be making sure every American who wants high-speed Internet access can get it. Rural Americans deserve the same digital access as those living in urban areas. A key way to reach this goal is by updating the high-cost universal service program to encourage cooperatives and other small, rural carriers to build more online infrastructure.

We need more deployment in sparsely populated rural areas if we're going to extend digital opportunity to all Americans. But I've heard from community leaders, Congress, and carriers that insufficient, unpredictable funding has kept them from reaching this goal. That is why I recently shared with my fellow commissioners an order that would promote more high-speed broadband deployment in rural areas. If adopted, it would provide over \$500 million in additional funding for cooperatives and small rural carriers—including those participating in the Alternative Connect America Model (A-CAM) plan. And it seeks public input on both further increasing support to current A-CAM recipients and on giving legacy rate-of-return carriers a new chance to elect model-based support. Increased funding will boost broadband deployment in rural America, and the accompanying reforms will put our high-cost system on a more efficient path, helping to ensure that every American can benefit from the digital revolution.

I appreciate your interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,

A handwritten signature in black ink that reads "Ajit V. Pai". The signature is fluid and cursive, with the first name "Ajit" being the most prominent part.  
Ajit V. Pai