

March 27, 2020

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th St. SW
Washington, D.C. 20554

Re: USTelecom Ex Parte Notice, WC Docket No. 18-89, *Protecting Against National Security Threats to the Communications Supply Chain Through FCC Programs*

Dear Ms. Dortch:

USTelecom writes in support of the Rural Wireless Association's (RWA) Request for Extension of Time to Report Supply Chain Security Information.¹ USTelecom recognizes and appreciates the importance of the supply chain information collection,² which will allow the Commission to appropriately size and scale the amount of equipment posing a threat to national security in the networks of ETCs. Indeed, this data will be fundamental to the Commission's determination of how to fund the replacement of covered equipment. Yet the extraordinary national crisis surrounding the COVID-19 pandemic requires the Commission to allow carriers leeway in reporting obligations in order to focus on providing broadband access to all customers today, when such access has never been more critical.

Due to COVID-19 and the near total reliance our nation now has on broadband performance, many providers are experiencing increased traffic and shifts in traffic that requires background network engineering in order to handle the traffic and give the consumer a seamless user experience.³ Like RWA,⁴ USTelecom's members report that the same engineers and officers who are responsible for completing the survey are now fully occupied with the greater mission of serving their customers at this time of need, necessitating more time to complete the information request. USTelecom also supports RWA's request for clarity on a number of issues

¹ Rural Wireless Association, *Request for Extension of Time to Report Supply Chain Security Information*, WC Docket No. 18-89 (filed Mar. 24, 2020) available at <https://ecfsapi.fcc.gov/file/103241353608744/RNSCsupplychainextension%20%20FINAL.pdf> (RWA Request for Extension of Time)

² See *Wireline Competition Bureau and Office of Economics and Analytics Open Reporting Portal for Supply Chain Security Information Collection*, Public Notice, WC Docket No. 18-89, DA 20-166 (WCB Feb. 26, 2020).

³ See USTelecom, Network Performance, <https://www.ustelecom.org/research/network-performance-data/> (Mar. 26, 2020).

⁴ RWA Request for Extension of Time at 2-3.

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related to the information request,⁵ which could also help to reduce the time burdens associated with completing the request.

Please contact me with any questions.

Sincerely,

_____/s/_____

Mike Saperstein

Vice President, Strategic Initiatives & Partnerships

⁵ *Id.* at 4.