

March 29, 2021

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

Re: **Rural Digital Opportunity Fund Auction, AU Docket No. 20-34**
Rural Digital Opportunity Fund, WC Docket No. 19-126
Connect America Fund, WC Docket No. 10-90
Notice of Ex Parte Communication

Dear Ms. Dortch:

On March 26, 2021, Tyson Curtis, CEO of Resound Networks, LLC (“Resound”), Bryan Waldrip, COO of Resound, Chadd Giles, CTO of Resound, Jordan Pruett, Director of Government Relations for Resound, and undersigned outside counsel to Resound met by video conference with Ramesh Nagarajan, Legal Advisor to Acting Chairwoman Jessica Rosenworcel. The purpose of the meeting was to discuss Resound’s response to recent ex parte letters in the above-referenced dockets that make false and speculative claims about Resound’s ability to meet its commitment to provide Gigabit Tier service in rural areas where it won Rural Digital Opportunity Fund (“RDOF”) Phase I support.

Mr. Curtis reviewed the attached presentation, which emphasized Resound’s proven management team and aggressive deployment strategy that has enabled the company to expand broadband service to more than 100 rural communities in Texas, New Mexico and Oklahoma. Employing a multi-technology approach, Resound offers service plans ranging from 10 Mbps to Gigabit download speeds via both fiber and fixed wireless technologies. Mr. Curtis indicated that Resound’s existing footprint covers more than 250,000 locations and is committed to covering an additional 219,000 RDOF locations in its RDOF area. He added that Resound’s capital invested per subscriber is \$750, and RDOF support will be \$1,400 per location, economics that make deployment of Gigabit Tier service very favorable. In fact, Mr. Curtis stated that Resound has already begun expanding infrastructure and service into its RDOF areas as part of its growth plan to serve rural Americans.

Mr. Curtis discussed the misconceptions that trade associations and an ad hoc group have submitted in the record, none of which made any effort to reach out to the company in advance of making their filings. As explained on slide 5 of the attached presentation, Resound has significant



capital resources to deploy alongside its RDOF support, including up to \$500 million in capital from its owners and up to \$100 million in a credit facility. Mr. Curtis responded to speculative claims about its bidding strategy by pointing out that Resound spent six months, 10,000 man-hours and more than \$1 million in pre-auction expenses to conduct significant due diligence on eligible census block groups. It adopted a disciplined strategy that focused on eligible areas with flat topology, minimal foliage, exceptional line-of-sight, access to existing infrastructure, and population density. As the map on slide 6 depicts, many of the RDOF areas Resound won at Auction 904 are adjacent to or near Resound's existing operations, enabling Resound to efficiently leverage existing infrastructure and resources as it expands into RDOF areas. As discussed above, Resound has vast management experience in deploying a variety of technologies to meet the needs of rural Americans, including fiber-to-the-home and millimeter wave fixed wireless technologies. Resound will deploy whatever technology solution is right for the particular area based on factors such as population density, topology, spectrum availability and infrastructure. Examples of this multi-technology approach are shown on slide 7.

In sum, claims that Resound is undercapitalized, bid irresponsibly and lacks experience are entirely false and misleading. The Commission cannot rely on conjecture from uninformed parties to undermine the auction results and prejudge the FCC's comprehensive vetting of Resound's long-form application. As stated on slide 11:

- “[T]he FCC has developed a robust auction procedure and vetting process. We are confident the FCC will maintain the integrity of the process and ensure all recipients have the technical and financial wherewithal to meet the well-defined obligations. The FCC is most qualified and best positioned to review and evaluate each recipient's long form.”
- “The FCC's technology neutral approach drives industry ingenuity and fosters competition and efficiency throughout the process. This results in rural Americans getting connected within a more expedient and effective timeline.”
- “Resound is fully committed to providing additional capital beyond the RDOF subsidies ensuring the most productive use of funds. This will allow funds to stretch further in closing the digital divide and should be welcomed by all.”

Resound is excited by the opportunities that its RDOF support will help create – expeditious buildout of robust broadband service to rural areas, investment of significant capital, and employment of hundreds of people committed to bridging the digital divide. Resound looks forward to engagement with experienced and expert Commission staff to complete its long-form review.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed in ECFS in the above-referenced dockets. Please contact the undersigned with any questions.

Respectfully submitted,

/s/ Stephen E. Coran
Stephen E. Coran

Attachment

cc: Ramesh Nagarajan
Travis Litman
Greg Watson
Austin Bonner
Carolyn Roddy
Michael Janson
Kirk Burgee
Jonathan McCormack
Audra Hale-Maddox
Kris Monteith
Alexander Minard
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