



NTTA

NATIONAL TRIBAL TELECOMMUNICATIONS ASSOCIATION



Ex Parte Communication – Filed Via ECFS

May 14, 2019

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

Re: *In the Matter of Connect America Fund*, WC Docket No. 10-90; Performance Measures for Connect America High-Cost Support Recipients

Dear Ms., Dortch:

The National Tribal Telecommunications Association (NTTA) files this Ex Parte Communication to express support of recent positions taken by WTA – Advocates for Rural Broadband (April 17 and May 6 Ex Parte Communications), and NTCA – The Rural Broadband Association (February 28, 2019 and May 7, 2019 Ex Parte Communications) regarding broadband performance testing.

Consistent with NTCA and WTA, NTTA members have significant concerns with the broadband testing protocols outlined in the *Performance Measurements Order* (WC Docket No. 10-90, DA 18-710, rel. 7/6/18). While NTTA members support the concept of testing broadband networks to ensure speeds advertised are actual speeds delivered for carriers receiving high-cost support, there is a legitimate concern that the testing protocols outlined in the *Performance Measurements Order* are not yet ready and will not be ready in time for testing to begin in the third quarter of this year. In addition, NTTA shares NTCA's and WTA's concerns about the requirement for carriers to test outside their networks, speeds and tiers to be tested, incompatible CPE, and the starting date.

NTTA also has concerns about the lack of accuracy in broadband availability data in Tribal areas, including what is reported in USAC's High-Cost Universal Broadband (HUBB) portal, and how that may translate into unforeseen difficulties and added costs for carriers serving Tribal areas.

Sincerely,

Godfrey Enjady, President
National Tribal Telecommunications Association

MR. GODFREY ENJADY, NTTA PRESIDENT

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