



MONTANA
TELECOMMUNICATIONS
ASSOCIATION

July 2, 2019

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

RE: WC Docket No. 19-126. Rural Digital Opportunity Fund

Dear Ms. Dortch,

On June 27, I met with Travis Litman of Cmr. Rosenworcel's office and Arielle Roth of Cmr. O'Rielly's office to discuss future support of broadband investment in rural America.

I pointed out that Montana's rural telecommunications providers have demonstrated their willingness and ability to invest in broadband infrastructure serving rural communities throughout Montana. Despite this track record of investment in broadband—using federal universal service funds for the purposes for which they are intended—there is more to do to meet current and future demand. Moreover, several communities and thousands of households in Montana are on the wrong side of the “rural/rural” digital divide.

In structuring the Rural Digital Opportunity Fund, the Commission should take into consideration such factors as a broadband provider's demonstrated track record in meeting quality of service and investment standards in areas served by the provider. And while reverse auctions are arguably the most economically efficient mechanism by which to allocate support, the Commission should recognize that in some cases, a reverse auction may not result in optimal investment opportunities with regard to speed, quality of service, and provider track record and qualifications, all of which should be weighted favorably in future funding decisions.

Respectfully submitted,

/s/

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