



September 3, 2020

via ECFS

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

RE: NOTICE OF EX PARTE
WC Docket No. 18-89 – *Protecting Against National Security Threats to the Communications Supply Chain Through FCC Programs*

Dear Ms. Dortch:

On September 1, 2020 the Rural Wireless Association, Inc. (“RWA”) representatives listed in Attachment A met by videoconference with Federal Communications Commission (“FCC” or “Commission”) representatives listed in Attachment B. The attendees discussed the Secure and Trusted Communications Networks Act of 2019’s (“Secure Networks Act”) reimbursement program and more specifically whether the Commission can provide any assurances to carriers that they will be reimbursed for replacement equipment they purchase before the final rules are adopted.

During the meeting, RWA members expressed their willingness to replace the unsecure equipment as quickly as possible but noted that they lack any assurances that they will be reimbursed for any purchases they make prior to the Commission adopting final rules and Congress appropriating the necessary funds for the Secure Networks Act. RWA members mentioned that they cannot afford to wait for such assurances as they are keen on providing the best service possible to their customers and are currently experiencing capacity restraints with the new school year and students’ remote learning beginning. RWA members also noted that 3G services are being turned off due to inability to support the networks with spares or with funding that is tied to a prohibition on universal service being used on Huawei or ZTE networks. This has eliminated 911 services in some rural areas where the an RWA member is the only service provider. Customers are being migrated to 4G LTE networks, but these networks’ coverage footprints will continue to be unable to fill the coverage voids left by the withering 3G networks until carriers are provided sufficient funds to replace their unsecure equipment. Impacted RWA members are stuck between a rock and a hard place until the rules are finalized and Congress appropriates the \$2 billion requested by Chairman Pai for the FCC to distribute. RWA’s associate members who provide equipment and services informed the FCC that they have been contacted by numerous customers who are poised to submit purchase orders but reluctant to do so due to this predicament, and they stated that vendors cannot afford to rollout “free” equipment to these carriers in consideration of the potential eventual existence of a reimbursement fund.

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RWA representatives also inquired about the possibility of carriers using their existing legacy universal service support to purchase replacement equipment.

Pursuant to Section 1.1206 of the Commission's Rules,¹ this ex parte is being filed electronically with the Office of the Secretary.

Respectfully submitted,

/s/ Carri Bennet

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cc: Justin Faulb
Ramesh Nagarajan
Janice Gorin
Charlene Goldfield
Elizabeth Cuttner
Pamela Arluk
William Layton
Rhonda Campbell
Jesse Goodwin
Brian Cruikshank

¹ 47 C.F.R. §1.1206.

Attachment A – RWA Representatives

Carri Bennet	General Counsel
Stephen Sharbaugh	Legislative and Policy Analyst
Jana Wallace	Panhandle Telephone Cooperative, Inc.
John Nettles	Pine Belt Communications
Jerry Tilley	Nemont
Lisa Hanlon	Teltech Group
Mike Meagher	Teltech Group
Jeffrey Marks	Nokia
Amit Patel	Nokia
Joe Weeden	Metaswitch
David Peters	Mavenir
Chris Crowe	t3broadband
Rob Falkner	t3broadband

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Attachment B – FCC Representatives

Justin Faulb (WCB)

Ramesh Nagarajan (WCB)

Janice Gorin (WCB)

Charlene Goldfield (WCB)

Elizabeth Cuttner (WCB)

Pamela Arluk (WCB)

William Layton (WCB)

Rhonda Campbell (WCB)

Jesse Goodwin (WCB)

Brian Cruikshank (WCB)