

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Connect America Fund)	WC Docket No. 10-90
)	

REPLY COMMENTS OF NTCA–THE RURAL BROADBAND ASSOCIATION

NTCA–The Rural Broadband Association (“NTCA”)¹ hereby submits these reply comments in response to comments filed pursuant to the Commission’s Public Notice in the above-captioned proceeding.² Commenters were divided on the method CAF II auction winners should be allowed to use if they wish to demonstrate the actual number of locations in their winning census block(s) is less than the number of locations estimated by the Connect America Cost Model (“CAM”). Additionally, some commenters encouraged the Commission to allow auction winners to include “prospective developments” among the actual number of locations.

With respect to how to address location count discrepancies, NTCA agrees with commenters who support using any or all of the three generally accepted methods of geolocation

¹ NTCA represents nearly 850 independent, community-based telecommunications companies and cooperatives and more than 400 other firms that support or are themselves engaged in the provision of communications services in the most rural portions of America. All of NTCA’s service provider members are full service rural local exchange carriers and broadband providers.

² *Wireline Competition Bureau Seeks Comment on Procedures to Identify and Resolve Location Discrepancies in Eligible Census Blocks within Winning Bid Areas*, WC Docket No. 10-90, Public Notice, DA 18-929 (rel. Sep. 10, 2018) (“Public Notice”).

identified by USAC for identifying actual locations.³ However, to the extent there are other verifiable, proven methods, such as 911 data created by local or state authorities, NTCA supports allowing such methods to be used to identify existing locations as well. Any methods other than those identified by USAC, however, must be derived from a well-established third-party resource, evidentiary-based, and auditable.

Furthermore, as proposed in the Public Notice and supported by some commenters,⁴ all locations, regardless of the method used to identify them, should ultimately be entered into the HUBB portal. This will allow for an established and trusted database accessible to anyone while also ensuring consistency and commonality in the data entered. Additionally, as the Commission noted, the HUBB “provides certain data validations, including checks to ensure entries are not duplicates and are located within specific census blocks.”⁵ Such validations will allow the data to be relied upon more quickly, allowing CAF II providers to focus their efforts on deploying broadband rather than correcting errors in the data submitted. Requiring data to be entered into the HUBB portal will also allow for a more complete picture of locations served by broadband due to the fact that the Commission already requires carriers who participate in other support mechanisms to report their data in the HUBB.⁶

³ See Comments of ITTA – The Voice of America’s Broadband Providers, WC Docket No. 10-90, Oct. 29, 2018 at p. 5.

⁴ See Comments of The Wireless Internet Service Providers Ass’n, WC Docket No. 10-90, Oct. 29, 2018, at p. 7.

⁵ Public Notice at ¶ 17.

⁶ See Universal Service Administrative Co., Filing Geolocated Broadband Deployment Data, <https://www.usac.org/hc/annual-requirements/hubb.aspx> (carriers participating in the identified funds must file latitude and longitude coordinates for all broadband locations deployed or upgraded) (last visited Nov. 9, 2018).

The Commission, Congress, and any number of reports have repeatedly demonstrated the need to bring high-speed Internet access to rural areas that have less than 10/1 Mbps speeds available, including some locations that do not have any level of broadband Internet service at all. The Commission itself noted in the Report and Order in this proceeding that “[o]ne of our objectives is to ensure that as many consumers as possible lacking 4/1 Mbps Internet access become served through implementation of Phase II.”⁷ Likewise, the Commission stated in its 2018 Broadband Deployment Report that “[f]ar too many Americans remain unable to access high-speed broadband Internet access.”⁸

Due to the *existing*, well known, lack of high speed Internet service in rural communities today, it would be a mistake for the Commission to allow limited, and much-needed, CAF II funds to be used for developments that may never be fully constructed or used. As Verizon noted in its Comments, “[e]ven if it appears today that a development is ‘reasonably certain’ to be built, the development could still be abandoned before or after construction.”⁹ Furthermore, the CAF II auction should not result in “a ‘scoreboard’ of locations served,”¹⁰ but rather, high-speed Internet service that can be sustained long-term and expanded to meet consumers’ and

⁷ *Connect America Fund et al.*, WC Docket No. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 5949, 5968 at ¶ 52 (2016).

⁸ *Inquiry Concerning Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion*, 33 FCC Rcd 1660, 1662 at ¶ 6 (2018).

⁹ Comments of Verizon, WC Docket No. 10-90, at p. 4 (Oct. 29, 2018). *See also*, Comments of USTelecom – The Broadband Association, WC Docket No. 10-90, at p. 2 (Oct. 29, 2018) (“there are too many unknowns with unfinished locations to consider them as part of the CAF program.”).

¹⁰ Statement of Shirley Bloomfield, CEO of NTCA – The Rural Broadband Ass’n, before the U.S. Senate Commerce, Science & Transportation Subcommittee on Communications, Technology, Innovation and the Internet, *The Universal Service Fund and Rural Broadband* (June 20, 2017).

businesses' needs. Anything less would be a waste of valuable universal service funds and would fail to meet the Commission's goal of expanding broadband service to unserved areas.

NTCA supports allowing CAF II auction winners to utilize any or all three of the methods recognized by USAC for establishing locations, along with any other methods that are data driven, verifiable and rely upon well-established third-party resources. Regardless of the method used, NTCA recommends the Commission require the data obtained be entered into the HUBB portal to ensure consistency both for the data collected and among the different services that already report deployment data in the HUBB portal. NTCA also encourages the Commission to ensure that limited funds are used as intended to deliver services to *existing* locations already identified as lacking sufficient access to broadband rather than prospective locations that may never be fully constructed or used.

Respectfully submitted,



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