

REPLY TO COMMENTS ON PETITION FOR PARTIAL RECONSIDERATION

as other petitions for reconsideration of the *Order*, was published in the Federal Register;² and the deadline for oppositions or comments was established as November 7, 2018.

No party filing in response to the petitions for reconsideration in this proceeding opposed the MTC Petition. Two parties, however, filed in support of the MTC Petition.

ITTA – The Voice of America’s Broadband Providers (“ITTA”) states that it supports a reduction in the number of subscribers required to be tested.³ ITTA believes the Commission “must rebalance the need to test a reasonable number of subscriber locations with minimizing the burden on providers to find customer locations to be tested.”⁴ Similarly, although their joint filing was styled an “opposition” because it addresses other petitions, NTCA–The Rural Broadband Association, National Rural Electric Cooperative Association (NRECA), and Utilities Technology Council jointly state that they support the MTC petition, noting that “MTC identifies, as did others filing for reconsideration or review, the burden on small companies to obtain customer consent to participate in testing.”⁵ None of the other five parties filing in response to the petitions for reconsiderations listed in the Federal Register Notice commented substantively on the MTC Petition.⁶

² 83 Fed. Reg. 53420, October 23, 2018 (“Federal Register Notice”).

³ Comments of ITTA – The Voice of America’s Broadband Providers (ITTA), WC Docket No. 10-90, November 7, 2018, at 1, 2.

⁴ *Id.* at 4.

⁵ Opposition of NTCA–The Rural Broadband Association, National Rural Electric Cooperative Association (NRECA), and Utilities Technology Council to Petitions for Reconsideration, WC Docket No. 10-90, November 7, 2018, at 2.

⁶ Comments of AT&T, WC Docket No. 10-90, November 7, 2018; Comments of Alaska Communications in Support of the Petition for Reconsideration and Clarification filed by USTelecom – The Broadband Association, ITTA - The Voice of America’s Broadband Providers, and the Wireless Internet Service Providers Association, WC Docket No. 10-90, November 7, 2018; Comments of Midcontinent Communications in Support of USTelecom and

In light of the lack of oppositions to the MTC Petition and the support expressed by four expert trade organizations, the Commission should grant the MTC Petition and provide the requested relief.

Respectfully submitted,

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WISPA's Petition, WC Docket No. 10-90, November 7, 2018; Comments of ADTRAN, Inc. On Petitions For Reconsideration, WC Docket No. 10-90, November 7, 2018; Opposition of Hughes Network Systems LLC to Petition for Reconsideration by Viasat, Inc., WC Docket No. 10-90, November 7, 2018.