

November 28, 2017

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re: *Connect America Fund*, WC Docket No. 10-90**

Dear Ms. Dortch:

We are rural telecommunications carriers that elected the revised offer of Alternative Connect America Model (A-CAM) support in Minnesota. (See Attachment A). We urge the Federal Communications Commission (“Commission”) to take action, before the end of this year if possible, to authorize additional A-CAM funding up to \$200/month per eligible customer location to enable more rural consumers in Minnesota to have the broadband connectivity necessary for jobs, education, healthcare, and economic development.

The time to act is now. The mechanism to distribute additional funds to advance broadband deployment is already in place. The additional funding will be targeted to high-cost census blocks that are not served by unsubsidized competitors where, absent support, it is not economically feasible to extend broadband service. We are already upgrading network infrastructure in our communities and are eager to further extend the reach of those networks to additional customers. If we receive additional funding now, we will be able to design our network upgrades in the most efficient manner to better serve our communities.

This additional funding will result in defined and measurable progress in closing the digital divide. The companies in Minnesota that elected the revised offer of A-CAM support in January 2017 committed at that time to deploy broadband to a specific number of additional locations if further funding were made available by December 31, 2017. We are ready, willing and able to meet those additional broadband deployment obligations. Collectively, additional funding of \$200/month per location would result in an additional 6,838 locations in Minnesota having access to a minimum of 25/3 Mbps broadband service, while 3,070 locations would newly have access to service of at least 10/1 Mbps. The number of A-CAM funded locations that would remain on “reasonable request” in Minnesota would decrease by 51% percent, or 5,293, if funding is increased to this level – meaning that the carriers serving these customers will have a concrete obligation to deploy broadband to them.

Allocating this additional funding to further extend broadband in our communities will result in more far reaching economic and social benefits. Access to broadband is critical to economic growth and productivity in rural areas, which will benefit the entire nation. Residents of rural Minnesota told us they are reluctant to expand their businesses because of limited broadband services available to them. Further extending the reach of broadband will enable more children in our communities to do their homework at home, allow our seniors to age in place, and result in healthcare savings for the chronically ill who can be remotely monitored at

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home. For example, with upgraded service to ACAM locations, rural Minnesota students will be able to more readily access a wider variety of content such as video streaming of live classes, documentaries and other educational programming.

We urge the Commission to act by the end of this year to allocate additional funding to carry out its original decision to provide A-CAM funding for up to \$200/month per eligible location.

Sincerely,

The Minnesota A-CAM Companies

cc: Chairman Ajit Pai  
Commissioner Mignon Clyburn  
Commissioner Michael O’Rielly  
Commissioner Jessica Rosenworcel  
Commissioner Brendan Carr

Attachment A

Attachment A  
Minnesota A-CAM Companies

Arvig Telephone Company  
Blue Earth Valley Telephone Company  
Bridge Water Telephone Company  
Cannon Valley Telephone Company  
Christensen Communications Company  
Clara City Telephone Company  
Easton Telephone Company  
Eckles Telephone Company  
Granada Telephone Company  
Hutchinson Telephone Company  
Mid-State Telephone Company  
Mid-State Telephone Company d/b/a KMP  
Minnesota Valley Telephone  
New Ulm Telecom, Inc.  
Northern Telephone Company  
Park Region Mutual Telephone Company  
Pine Island Telephone Company  
Rothsay Telephone Company  
Sacred Heart Telephone Company  
Sleepy Eye Telephone Company  
Starbuck Telephone Company  
Valley Telephone Company  
Western Telephone Company  
Wikstrom Telephone Company  
Wilderness Valley Telephone Company, Inc.  
Winsted Telephone Company  
Winthrop Telephone Company  
Zumbrota Telephone Company