December 3, 2021

Via Electronic Submission

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
45 L Street, NE
Washington, D.C. 20554

Re: Ex Parte Presentation - Wireline Competition Bureau Seeks Comment on the Implementation of the Affordable Connectivity Program, WC Docket No. 21-450

Dear Ms. Dortch:

On December 2, 2021, the undersigned of AT&T Services, Inc. had a telephone conversation with Trent Harkrader, Acting Special Advisor to the Chairwoman and Deputy Bureau Chief of the Wireline Competition Bureau to discuss the transition process for existing Emergency Broadband Benefit (EBB) customers and participating providers to the recently enacted Affordable Connectivity Program (ACP) created by the Infrastructure Investment and Jobs Act (Act).¹ A smooth and easy transition is critical to keeping eligible households connected. AT&T urged the FCC to issue guidance that provides transparency and clarity while considering implementation concerns through this upcoming transition. AT&T noted that ACP rules should build upon the current EBB requirements while providing guidance to providers on the new requirements in the Act.

Furthermore, in anticipation of the effective start date of ACP on December 31, 2021, AT&T noted that EBB participating providers that plan to participate in the ACP need time to implement required changes after the FCC adopts its ACP rules on or around January 14, 2022. So that there is not a significant gap between enrollments in EBB ceasing and the start of ACP, the FCC should allow EBB participating providers to enroll eligible households in ACP pursuant to the existing EBB rules (except that the benefit amount for eligible non-Tribal households would be reduced to up to $30 and the eligibility criteria would be modified in accordance with the Act) from December 31, 2021, until a participating provider has implemented the new ACP rules.

Lastly, AT&T encouraged the FCC to consider ACP rules that are efficient, administrable and encourages participation in the voluntary program and to refrain from imposing rules that are burdensome on providers and consumers. AT&T emphasized that participating providers should only be required to offer ACP on generally available actively sold plans, with the option to include grandfathered plans, and, like EBB, participating providers can use commissioned agents to facilitate enrollment in the ACP.

¹ Infrastructure Investment and Jobs Act, H.R. 3684, 117th Cong. (2021) ("Act").
In accordance with section 1.1206(b)(2) of the Commission's rules, this letter is being filed electronically with your office. Please feel free to contact me if you have any questions.

Sincerely,

/s/ Anisa Green

CC: Trent Harkrader