

December 4, 2017

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

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

Dear Ms. Dortch:

We are five rural telecommunications carriers in California that elected the offer of Alternative Connect America Model (A-CAM) universal service support. We operate in diverse rural markets in California, ranging from a tribal reservation near the U.S. border with Mexico to the northern part of the state bordering Oregon, and in between. We ask the Federal Communications Commission (Commission) to authorize additional A-CAM funding up to \$200/month per eligible customer location before the end of this year. No further deliberations are necessary, as the Commission already has a program in place to distribute additional funds to advance broadband deployment.

Rural Californians need broadband, and we urge you to act now to address this problem. Rural areas in California face disproportionately high poverty and unemployment. One of the California A-CAM companies operates in Imperial County, which has the highest unemployment rate in the State of California – over 20 percent. Sustainable economic development requires greater connectivity to the rest of the state, the nation, and the world.

Providing additional funding to further extend broadband in our communities will produce other benefits for consumers in California as well. Online learning requires broadband access. Broadband is essential for children in our communities to do their homework at home. Broadband at home will improve healthcare for the chronically ill, resulting in cost savings. Additional funding at Winterhaven Telephone Company will help push fiber deeper into the Quechan reservation where increased broadband availability and adoption are critical to the future of tribal members and their families.

Authorizing additional A-CAM funding will result in defined and measurable progress in closing the digital divide because there will be a concrete obligation to deploy broadband to additional customers. The companies in California 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. Collectively, additional funding of \$200/month per location would result in a 12 percent increase in the number of new locations in California having access to a minimum of 25/3 Mbps broadband service, and a 12 percent increase in new locations having access to service of at least 10/1 Mbps. The number of A-CAM funded locations that would remain on “reasonable request” in

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California would decrease by 36 percent if funding is increased to this level. Acting now will enable companies to complete the planning process for network improvements, resulting in a more efficient deployment schedule.

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 California A-CAM Companies

Cal-Ore Telephone Company
Happy Valley Telephone Company
Hornitos Telephone Company
Pinnacles Telephone Company
Winterhaven Telephone Company

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