

December 5, 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 sixteen rural telecommunications carriers in New York State that are participants in the Alternative Connect America Model (A-CAM) support program. We are writing today to urge action by the Commission before the end of this year to authorize additional A-CAM funding up to \$200/month per eligible customer location. This additional funding would have a notable positive impact for rural consumers in our State.

The companies in New York that elected the offer of A-CAM support committed to deploy broadband to a specific number of additional locations if further funding were made available by December 31, 2017. Raising the funding to \$200/month per location would result in an additional 1,143 rural consumers in New York having access to a minimum of 25/3 Mbps broadband service, while 382 additional locations would have access to service of at least 10/1 Mbps. The number of A-CAM funded locations that would remain on “reasonable request” in New York would decrease by 81% if funding were increased to this level – meaning that the companies serving these customers would have a concrete obligation to deploy broadband to them.

Allocating this additional funding to further extend broadband in our communities will result in far reaching benefits. Our customers are telling us how important Telehealth is, as it enables their doctors to examine and treat them remotely and in real time, using online streaming video technology, wearable devices, and interactive tools. Telehealth has made advances that allow for digital transfer of information that once required traditional telephone technology. Today, a broadband connection allows healthcare professionals to evaluate, diagnose and treat patients remotely, which can be life changing in these rural areas.

Another issue in rural New York related to a lack of broadband concerns the education of our children. There is the obvious need for access to information for study. Further, access to broadband also enables children and their parents to be engaged in the educational process through web portals that provide an interface to communicate with teachers and administrators, real-time access to assignments and grades, and numerous educational resources. In the same vein, distance learning has become an important component of mainstream education for colleges, adult education programs, virtual elementary schools, and home schooling.

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The time to act is now, as the mechanism to distribute additional funds to advance broadband deployment is already in place. We are already upgrading network infrastructure in our communities and are eager to further extend the reach of those networks to additional rural consumers. 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.

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,

James Becker
President
The Middleburgh Telephone Company

Armstrong Telephone Company
Chazy and Westport Corp.
Citizens Telephone Company – Hammond
Delhi Telephone Company
Deposit Telephone Company
Edwards Telephone Company
Empire Telephone Corp.
Township Telephone Company

Newport Telephone Company
Nicholville Telephone Company
Oriskany Falls Telephone Company
Pattersonville Telephone Company
Port Byron Telephone Company
Fishers Island Telephone Corp
The Middleburgh Telephone Company
Vernon Telephone Company

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