

December 11, 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 rural telecommunications carriers that elected the revised offer of Alternative Connect America Model (A-CAM) support in Pennsylvania. We submit this letter to emphasize how important it is to our communities for the Federal Communications Commission to adopt a decision before the end of this year to authorize additional A-CAM funding up to \$200/month per eligible customer location to bring broadband to more rural residents in the Commonwealth of Pennsylvania. Broadband connectivity is critical for our customers to participate fully in today's society.

We urge you to act now. There is an existing framework to distribute additional funds to advance broadband deployment in unserved areas, and that funding will produce measurable results. A decision now will enable us to schedule construction in a logical and cost-effective manner, and avoid any need to revise our network engineering plans at a future date.

This additional funding will produce tangible benefits in closing the digital divide. The four companies in Pennsylvania 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 becomes available by December 31, 2017. Collectively, additional funding of up to \$200/month per location would result in an increase of 10% in the number of rural locations in Pennsylvania having access to a minimum of 25/3 Mbps broadband service and an increase of 11% in the number of rural locations that would become newly served with at least 10/1 Mbps service. The number of A-CAM funded locations that would remain on the "reasonable request" standard for our companies would decrease by 94 percent if funding is increased to this level. The net result is that we would have a concrete obligation to deploy broadband to virtually all of our rural customers.

Rural broadband is particularly significant in Pennsylvania, where roughly 27 percent of the population lives in rural areas. More than half of the businesses in rural Pennsylvania are small businesses, with fewer than five employees. Broadband is increasingly necessary, both at work and at home. High speed broadband access is necessary to provide telemedicine and telehealth services that are vital to the delivery of healthcare in rural communities. According to the Center for Rural Pennsylvania, a legislative agency of the General Assembly, the number of residents over 65 in rural Pennsylvania is projected to grow steadily in the coming years, representing 25 percent of the population by 2040. In 2014, there was only one physician per 586

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residents in rural Pennsylvania, compared to one physician per 288 residents in urban areas. Broadband is critical to healthcare for our aging population.

Inadequate broadband speeds in rural areas also disadvantage children because much of their school work is now web-based. A parent recently wrote:

Regarding the needs of students, our rural school district requires students to use the internet. The majority of classes have no textbooks and instead use internet sites like Khan Academy and various YouTube teaching videos. It would be nearly impossible for any student in our school district to be successful without high speed internet and yet the school district knows that many of our students do not have this access. If we want our students to be able to compete in a global workplace, they need to be computer literate, including internet . . . those who live in areas without high speed internet also are limited in options of on-line charter schooling.

For these reasons, we urge the Commission to act by the end of this year to provide additional A-CAM funding up to \$200/month per eligible location.

Sincerely,

Pennsylvania A-CAM Companies

Northeast Pennsylvania Telephone
North Penn Telephone Company
Mahanoy & Mahantango Telephone Company
Sugar Valley Telephone Company

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