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TOM FORESE – Chairman
BOB BURNS
ANDY TOBIN
BOYD DUNN
JUSTIN OLSON



TED VOGT
Executive Director

**ARIZONA CORPORATION
COMMISSION**

December 19, 2017

The Honorable Ajit Pai
Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

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

Dear Chairman Pai:

The Arizona Corporation Commission ("Arizona Commission") is writing in support of the requests by Arizona Telephone Company, Southwestern Telephone Company, and Hopi Telecommunications, Inc (collectively "the Arizona rural telecommunications carriers") for additional Alternative Connect America Model ("A-CAM") universal service support to increase broadband connectivity in their service areas. We have attached a letter from the Arizona rural telecommunications carriers dated November 30, 2017 filed in Docket No. WC 10-90 requesting that the Federal Communications Commission ("FCC") authorize additional A-CAM funding up to \$200 per month per location by December 31, 2017 for this purpose.

The Arizona Commission strongly supports efforts to expand broadband connectivity in the State. Earlier this year, the Arizona Commission modified its Arizona Universal Service Fund rules to create the Broadband Special Construction Matching Fund program. This program was put in place to take advantage of provisions in the FCC's recent E-Rate Modernization Orders which allow a state to receive federal matching funds up to a certain limit if the state provides funds for the purpose of bringing broadband to schools and libraries in the State. This was part of a collaborative effort by the State of Arizona, including the Governor's Office, the Superintendent of Public Instruction and the Arizona Department of Education to increase broadband connectivity to Arizona schools and libraries.


Full funding under the A-CAM program for the three Arizona rural telecommunications carriers would bring an additional \$1.05 million to their service areas. This is the difference between the \$200.00 per location originally offered by the FCC versus the \$146.00 A-CAM funding per location the companies actually received from the Federal fund. With this increase in funding, an additional 129 locations would get broadband speeds of 25/3 and an additional 386

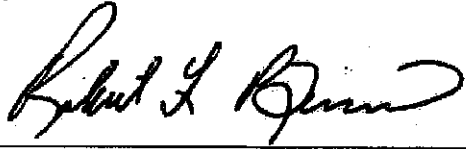
The Honorable Ajit Pai, Chairman
December 19, 2017
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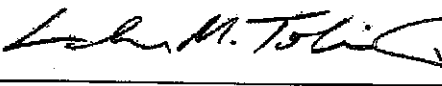
locations would receive broadband with speeds of 10/1. This will make a profound difference in the lives of many rural Arizonans.


In summary, we support the Arizona rural telecommunications carriers request that the FCC authorize additional A-CAM funding up to \$200.00 per location per month by December 31, 2017. Thank you for your consideration of this important matter and your continued efforts to bring broadband to rural America.


Sincerely,


CHAIRMAN TOM FORESE


COMMISSIONER BOB BURNS


COMMISSIONER ANDY TOBIN


COMMISSIONER BOYD DUNN


COMMISSIONER JUSTIN OLSON

cc: The Honorable Mignon Clyburn
The Honorable Michael O'Rielly
The Honorable Brendan Carr
The Honorable Jessica Rosenworcel
Kris Monteith, Wireline Competition Bureau Chief
Marlene Dortch, Secretary

November 30, 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 the Arizona rural telecommunications carriers that elected the revised offer of Alternative Connect America Model (A-CAM) support from the Federal Communications Commission ("Commission") in the above-captioned docket earlier this year. We have begun using A-CAM funds to deploy the infrastructure that will enable more rural consumers in Arizona to have the broadband connectivity necessary for jobs, education, healthcare, and economic development in our State. We are writing to strongly urge the Commission to authorize additional A-CAM funding up to \$200/month per location by December 31, 2017.

This additional funding will accelerate our efforts to close the digital divide in Arizona. With increased funding, rural consumers in hundreds of additional locations in the State would be guaranteed access to at least 10/1 Mbps broadband service. The number of locations that would be guaranteed service of at least 25/3 Mbps would increase by 10%, and the number of locations subject to "reasonable request" would decrease by over 30%. These improvements in service would have a tremendous impact on those rural Arizonans they touch.

It is well understood that access to broadband is critical to economic growth and productivity in rural areas and increased rural area productivity benefits the entire nation. Regarding students living in rural areas, the Governor of Arizona recently stated:

Arizona has diverse terrain that includes mountains, deserts, and widespread distances between consolidated populations (over 84 percent of the population lives in 10 percent of the state). These factors create obstacles for service providers to install the necessary infrastructure for broadband connectivity. The resulting lack of access to high-speed internet in rural areas makes it difficult for teachers to access online tools for classroom instruction, conduct professional development, complete certification, and utilize student dashboards with real-time instructional data that informs instructional decisions. It also makes it challenging for students to access online courses, perform online research, take online assessments, and utilize other free educational services created by the state"

Ms. Marlene Dortch
November 30, 2017
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Moreover, broadband development is vital for tribal lands to unlock their socioeconomic and political potential. In sum, broadband provides promise for the future of rural communities that simply are at a disadvantage without it.

The Commission should act now to authorize increased A-CAM funding. We are already upgrading network infrastructure in our communities and are eager to further extend the reach of those networks to additional customers. If additional funding is authorized now, we will be able to design our networks in the most efficient manner to better serve Arizonans.

Sincerely,

Arizona A-CAM Companies

Hopi Telecommunications, Inc.
Arizona Telephone Company
Southwestern Telephone Company

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