

December 1, 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 that elected the revised offer of Alternative Connect America Model (A-CAM) support in Washington State. We ask the Federal Communications Commission (“Commission”) to take action before the end of 2017 to authorize additional A-CAM funding up to \$200/month per eligible customer location. That will provide broadband connectivity to more rural consumers across the country, including consumers in Washington State. Improved access to broadband is critical for local economic development, education, healthcare, citizen access to government services, and more.

It is important for the Commission to act soon to provide additional funding for A-CAM plan participants. If the Commission acts this year, we will be able to plan and implement efficient network upgrades. It is more cost effective to send work crews to a particular geographic area once, and be done, rather than sending them back at a later date to extend service to more distant customers. We are already upgrading network infrastructure in our communities and are eager to further extend the reach of those networks to additional customers.

There is no reason to wait. The Commission has already adopted a framework to distribute additional funds to advance broadband deployment in our rural communities. A-CAM funding is targeted to high-cost census blocks that are not served by unsubsidized competitors where, absent support, it is not economically feasible to extend broadband service. Additional funding will allow us to extend our networks farther into high-cost areas.

We have committed to defined additional broadband deployment obligations if increased funding is made available. Should additional funding be authorized by December 31, 2017, the number of rural consumers guaranteed 25/3 Mbps broadband service in Washington State would increase by 8.7% and the number of rural consumers guaranteed 10/1 Mbps service would increase by 9%. Moreover, the number of A-CAM funded locations that would remain on “reasonable request” in Washington State would decrease by 32% if the Commission acts now, since the carriers serving those customers would have a concrete obligation to deploy broadband to them. To provide one example, in the area served by Pioneer Telephone Company, many of the farms that remain on the “reasonable request” standard are in areas that are very high cost. If additional funding is made available, many more of these customers will have access to at least 4/1 Mbps service and will be able to take advantage of the technology available to farmers in other geographic areas.

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We urge the Commission to act by the end of this year to allocate additional funding consistent with its original decision to provide A-CAM funding for up to \$200/month per eligible location.

Sincerely,

The Washington A-CAM Companies:

Asotin Telephone Company
Lewis River Telephone Company, Inc.
Martell Enterprises, Inc.
McDaniel Telephone Company
Pioneer Telephone Holding Company

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