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 rural telecommunications carriers that elected the revised offer of Alternative Connect America Model (A-CAM) support in Wisconsin. (See Attachment A). We urge the Federal Communications Commission (“Commission”) to take action, before the end of this year if possible, to authorize additional A-CAM funding up to $200/month per eligible customer location to enable more rural consumers in Wisconsin to have the broadband connectivity necessary in today’s economy.

This additional funding will result in defined and measurable progress in closing the digital divide in the State of Wisconsin. The companies in our State that elected the revised 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. We are ready, willing and able to meet those additional broadband deployment obligations. Collectively, funding of $200/month per location would result in an additional 2,819 locations in Wisconsin having access to a minimum of 25/3 Mbps broadband service, while 987 locations would newly have access to service of at least 10/1 Mbps. The number of A-CAM funded locations that would remain on “reasonable request” in Wisconsin would decrease by 78% percent, or 1,938, if funding is increased – meaning that the carriers serving those customers will have a concrete obligation to deploy broadband to them.

There is no need for delay. The mechanism to distribute additional funds to advance broadband deployment is already in place. The additional funding will be 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. 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.

Allocating this additional funding to further extend broadband in our communities will result in more far reaching economic and social benefits. Residents of rural Wisconsin have told us they are reluctant to expand their businesses because of the limited broadband services available to them. Further extending the reach of broadband will enable more children in our communities to do their homework at home, allow our seniors to age in place, and result in healthcare savings for the chronically ill who can be remotely monitored at
home. With upgraded service to A-CAM locations, rural Wisconsin students will be able to more readily access a wider variety of content such as video streaming of live classes, documentaries and other educational programs.

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 Wisconsin A-CAM Companies

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

Attachment A
Attachment A

Wisconsin A-CAM Companies

Amery Telcom, Inc.
Badger Telecom
Black Earth Telephone Company
Bonduel Telephone Company
Bruce Telephone Company
Burlington, Brighton, & Wheatland Telephone Company
Central State Telephone Company
Clear Lake Telephone Company
Coon Valley Farmers Telephone Company, Inc.
Dickeyville Telephone
Eastcoast Telecom
Farmers Independent Telephone Company
Farmers Telephone Company
Grantland Telecom
Hillsboro Telephone Company, Inc.
Mid-Plains Telephone
Midway Telephone Company
Mosinee Telephone Company
Mt. Vernon Telephone Company
Riverside Telecom
Scandinavia Telephone Company
Somerset Telephone Company
Southeast Telephone Company of Wisconsin
State Long Distance Telephone Company
Stockbridge & Sherwood Telephone Company
Tenney Telephone Company
Union Telephone Company
UTELCO
Waunakee Telephone Company
Wittenberg Telephone Company