March 23, 2020

Ex Parte
Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

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

Dear Ms. Dortch:

On March 20, 2020, the undersigned, Cathy Carpino and Hany Fahmy, for AT&T, Jeff Lanning, Richard Rousselot, and Jamal Boudhaouia, for CenturyLink, AJ Burton and Diana Eisner, for Frontier, Michael Skrivan, for Consolidated and Thomas Whitehead, for Windstream, met via telephone conference with Suzanne Yelen, of the Wireline Competition Bureau. The purpose of the meeting was to discuss issues of concern for USTelecom members as they attempt to meet performance testing obligations while they also respond to the COVID-19 pandemic.

USTelecom members alerted Ms. Yelen to the unexpected circumstances that are making meeting performance testing obligations difficult or in some instances impossible given the COVID-19 pandemic. Although USTelecom members are at different stages in the pre-testing process they have found any one of the following experiences to be roadblocks to meeting their obligations:

- Service providers that are attempting to install equipment in customer homes have found themselves unable to do so due to social distancing and quarantine measures.
- Service provider technicians who would normally be doing testing are now working on responding to other customer needs and maintaining critical network operations.
- Service provider call centers that would normally being doing needed outreach to implement testing are inundated with other consumer requests due to the COVID-19 emergency, including requests for service upgrades, restorations and repairs.
- Service providers that are pre-testing are finding very high aborted test rates due to customer usage making it impossible not only to retry testing every minute as per the Commission’s order, but to force testing due to the unprecedented increase in user traffic.
while so many consumers are sheltering in place. With such high usage, the tests are disruptive to the customer experience and only serve to increase traffic.

In light of these issues, USTelecom members requested that the Commission issue the necessary waivers to try to minimize the impact on the network and solve for the aforementioned problems with the testing process. Specifically, we suggested the Commission permit providers to: (1) select additional randomly selected test locations rather than attempting to replace incompatible modems during the current emergency; (2) proceed with testing in the second quarter with samples of fewer than 50 locations; and (3) retry testing as often as they can during each testing hour if high usage is detected (even if such retry attempts do not occur once per minute), and not force testing when doing so will disrupt the customer’s service.

Finally, we also discussed issues with the current testing report template. Ms. Yelen also asked providers whether they could populate the current testing template using assumptions about the start and end time of the test if they do not currently capture all of the data elements contained in the template. USTelecom members indicated they would have to look into that possibility.

Please contact the undersigned should you have any questions.

Respectfully submitted,

USTELECOM -The Broadband Association

By: ___________________________________
   B. Lynn Follansbee
   Vice President –Policy & Advocacy

cc: Suzanne Yelen