



December 17, 2020

VIA ECFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

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

Dear Ms. Dortch:

On Wednesday, December 16, 2020, the undersigned on behalf of NTCA–The Rural Broadband Association (“NTCA”) spoke via telephone with Suzanne Yelen from the Wireline Competition Bureau (the “Bureau”). During this conversation, NTCA relayed concerns about the continuing impacts of COVID-19 – particularly in rural areas where cases are on the rise – on the installation of devices in customer premises necessary for testing of network performance as required by Federal Communications Commission (“Commission”) rules for various high-cost universal service fund (“USF”) programs. NTCA also highlighted how growing problems in telecommunications supply chains are exacerbating the ability to obtain the equipment needed to perform such tests.

As background, starting in the first quarter of 2021 and continuing through the remainder of next year, Commission rules require providers receiving high-cost USF support via the A-CAM 1 programs and the Alaska Plan, among others, (“the 2021 Pre-Test Class”) to begin “pre-testing” – conducting and reporting on the results of “practice tests” that capture the performance of supported networks in serving a sample of active subscriber locations randomly selected by the Universal Service Administrative Company (“USAC”). Earlier this year, however, recognizing the complications presented by COVID-19 in making entry into customer premises simply to install testing equipment and for no other service-related purpose, the Bureau granted a waiver on its own motion and provided other recipients of high-cost USF support flexibility in sampling and pre-testing requirements. Specifically, the Bureau adopted a regime that effectively required these providers to conduct pre-testing with respect to at least 70% of the USAC-selected sample and/or a comparable number of locations. *Connect America Fund*, WC Docket No. 10-90, DA 20-748, Order (rel. July 17, 2020). In the discussion, NTCA urged the Commission and Bureau to provide similar flexibility to the 2021 Pre-Test Class of carriers in 2021 in light of the continuing – and, in many rural areas, increasing – impacts of COVID-19.

NTCA also highlighted, however, increasing concerns related to the availability of equipment needed to test. NTCA members report significant and growing difficulties in obtaining telecommunications supplies, including customer premises equipment for network performance testing. *See* Comments of NTCA, GN Docket No. 20-269 (filed Sept. 18, 2020), at 8. Indeed, approximately 90% of members responding to a recent survey indicated delays in procuring supplies, with 21% specifically identifying problems in obtaining customer premises equipment – such as that needed to test for performance. Nearly one-third of those reporting delays anticipated a delay of 5 to 8 weeks while the same amount expected delays of more than 12 weeks. Moreover, such delays are not confined to smaller operators or those subject to performance testing requirements – a recent report released by the Department of Homeland Security’s Cybersecurity & Infrastructure Security Agency in collaboration with the coordinating councils for the communications and information technology sectors observed more broadly that the COVID-19 pandemic “rapidly decimated global supply chains as the virus spread from one continent to another” and that communications service providers were more adversely affected by supply chain disruptions as compared to other businesses. *Building a More Resilient ICT Supply, Chain: Lessons Learned During the COVID-19 Pandemic*, Cybersecurity & Infrastructure Security Agency, Communications Sector Coordinating Council, and Information Technology Sector Coordinating Council (Nov. 2020) (https://www.cisa.gov/sites/default/files/publications/lessons-learned-during-covid-19-pandemic_508_1.pdf) (visited Dec. 16, 2020), at 4-6. In light of such concerns and despite best efforts to plan months in advance, NTCA stated that some providers in the 2021 Pre-Test Class may have difficulty procuring enough equipment to test 70% of selected locations, and NTCA therefore noted that additional relief, such as streamlined individual waiver processes or some other well-defined means for advising the Commission of such concerns, will be needed to address such supply chain issues.

Thank you for your attention to this correspondence. Pursuant to Section 1.1206 of the Commission’s rules, a copy of this letter is being filed via ECFS.

Sincerely,

/s/ Michael R. Romano

Michael R. Romano
Senior Vice President –
Industry Affairs & Business Development
NTCA–The Rural Broadband Association

cc: Suzanne Yelen