



June 11, 2019

By Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: *Universal Service Contribution Methodology*, WC Docket No. 06-122

Dear Ms. Dortch:

The parties listed on the attached joint statement respectfully oppose the proposal to place a cap on the federal Universal Service Fund and respectfully submit this joint statement for the record of the above-captioned proceeding. Please let me know if you have any questions.

Respectfully submitted,

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June 11, 2019

The parties listed below make the following joint statement regarding the [Notice of Proposed Rulemaking \(NPRM\)](#) issued by the Federal Communications Commission proposing to place a cap on the federal Universal Service Fund (USF):

When Congress codified the concept of universal service by enacting the Telecommunications Act of 1996, it called for the creation of different programs tailored to promote affordable communications services for those most in need, from students, library patrons and rural hospitals to low-income and rural communities. Grouped under a single umbrella of the Universal Service Fund, these programs are intended to work in concert to address the “digital divide” and ensure that all consumers have access to high-quality and affordable communications. Indeed, our nation’s economic well-being and the well-being of people and businesses in rural and low-income communities require universal access to affordable, quality, high-speed broadband.

The parties listed below believe that placing an overall cap on the USF puts at risk the comprehensive mission of universal service as Congress intended and articulated it. An overall USF cap, even if sized to meet current overall demand or the sum of authorized levels plus inflation, could still end up pitting these essential programs against each other in the future and undermine efforts to solve the “digital divide.” By contrast, the 1996 Act specifically directs the FCC to ensure that the Universal Service Fund has “sufficient” funding, and the FCC must therefore evaluate and size each program to suit its unique and essential universal service mission. An overarching cap would thus undermine efforts to ensure that funding for each program is and will remain “sufficient” to satisfy Congress’ mandates for universal service for all.

For these reasons, the organizations and associations listed here respectfully oppose the imposition of an overall cap on the Universal Service Fund.

AASA, The School Superintendents Association

Access Humboldt

Advanced Data Services, Inc. (ADS)

Advocates for Basic Legal Equality (ABLE)

Alliance for Excellent Education

American Civil Liberties Union (ACLU)

American Library Association (ALA)

Appalshop

Ms. Marlene H. Dortch

June 3, 2019

Page 3 of 5

Asian Americans Advancing Justice | AAJC

Association of Educational Service Agencies

Benton Foundation

Center for Rural Strategies

Chief Officers of State Library Agencies (COSLA)

Citizens Coalition

Common Cause

Common Sense Media

Communications Workers of America

Conterra Networks

Consortium for School Networking (COSN)

Consumer Federation of America (CFA)

Free Library of Philadelphia

Georgia K-12 CTO Council

Greenlining

Illinois Educational Technology Leaders (IETL)

Infinity Communications & Consulting, Inc.

Institute for Local Self-Reliance

The Leadership Conference on Civil and Human Rights

Louisiana CTO Council

MediaJustice

Midland Council of Governments

Missouri Educational Technology Leaders (METL)

Mobile Beacon

NAACP

National Association of State Boards of Education

National Collaborative for Digital Equity (NCDE)

National Consumer Law Center, on behalf of its low-income clients (NCLC)

National Digital Inclusion Alliance (NDIA)

Ms. Marlene H. Dortch

June 3, 2019

Page 4 of 5

National Hispanic Media Coalition (NHMC)

National Rural Education Association

National Rural Education Advocacy Consortium

National Tribal Telecommunications Association

Native Public Media

Next Century Cities

North Central Ohio Computer Cooperative (NCOCC)

Northern Buckeye Education Council

NTCA – The Rural Broadband Association

New America's Open Technology Institute (OTI)

New York State Association for Computers and Technologies in Education (NYSCATE)

OCA - Asian Pacific American Advocates

Pennsylvania Association for Education Communications and Technology (PAECT)

Rural Wireless Association, Inc.

Schools, Health & Libraries Broadband (SHLB) Coalition

SouthWest Ohio Computer Association (SWOCA)

State Educational Technology Directors Association (SETDA)

Texas K-12 CTO Council

Tri-County Computer Services Association

Tribal Digital Village Network (TDVNet)

United Church of Christ, OC Inc. (UCC OC Inc.)

Urban Libraries Council (ULC)

Velocity Fiber

Virginia Society for Technology in Education (VSTE)

Voqal

WTA-Advocates for Rural Broadband

Yavapai County Education Service Agency

Ms. Marlene H. Dortch

June 3, 2019

Page 5 of 5

For more information, please contact:

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SHLB Coalition: Alicja Johnson, ajohnson@shlb.org.

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