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
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)
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
For more information, please contact:

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American Library Association, Shawnda Hines, shines@alawash.org
Citizens Coalition: Joseph Patrick Meissner (meissnerjoseph@yahoo.com)
Common Sense Media: Stephanie Ong, song@commonsense.org
National Consumer Law Center, on behalf of its low-income clients: Jan Kruse (jkruse@nclc.org)
Next Century Cities: Jessica Del Fiacco (jessica@nextcenturycities.org)
SHLB Coalition: Alicja Johnson, ajohnson@shlb.org.
ULC: Curtis Rogers, crogers@urbanlibraries.org