



July 11, 2017

As a member of the Executive Committee of the Small Company Coalition (SCC), an alliance of rural telecommunication and broadband Internet providers as well as supporting vendor companies, from across the United States, I submit these comments, and the associated referenced Federal Regulatory Compliance Reporting Summary, for the Federal Communication Commission's (FCC) review and consideration.

The SCC lauds the FCC's July 7, 2017 publication of Report and Order 17-87, eliminating several unnecessary and duplicative reporting requirements. As suppliers of advanced telecommunications services to rural and remote communities, the SCC is well acquainted with such requirements, and the burden they represent for small entities like our member companies.

The SCC has been a leading voice for rural telecom providers since 2012, bringing real-world experience to the table both to inform policymakers of the honest challenges we face, and to promote positive change in the way the industry operates and is regulated.

To this end, in 2015 we evaluated reporting requirements and assessed the number of labor hours consumed by each requirement. Referring to the attached updated Federal Regulatory Compliance Reporting Summary, as you can see, the hours necessary for reporting requirements alone amount to over 900 hours per year.

In other words, such reporting consumes approximately 23 weeks of full time work per year (@ 40 hrs/wk) – or over five (5) months of full time labor.

Of course, we are cognizant of the FCC's need for information for a variety of purposes. As one might imagine, however, we believe that this function should not constitute such a drain on our limited resources.

As always, we appreciate your time and consideration, and look forward to working with the FCC on this and other important matters.

Sincerely,

James J. Kail  
Executive Committee Member

Attachment