



- Generally speaking, the SCC urges the Commission to consider the regulatory burden associated with all reforms stemming from the proposals currently under consideration. The labor-hours required for compliance with all regulations should be persistently matched to the value derived from any adopted rules. With this in mind, and in response to Section III, Part A, paragraph 9, the SCC calls the Commission's attention to potentially duplicative reporting requirements between the Affordable Connectivity Program ("ACP") data collection and the Form 477, which is filed twice per annum. Because broadband providers already submit information on upload speeds, download speeds, and latency compliance for the Performance Measurement Module, we advise that the Commission take as much desired information as possible from currently existing filings before requiring additional filings that comprise superfluous submissions.
- In response to the questions posed in paragraph 7 of the same section listed above, the SCC contends that while some providers may collect demographic information on their customers, this is not commonplace, and particularly less so among small, rural and Tribal broadband providers. As such, the SCC suggests that the Commission elect not to require such information be collected by such providers. This requirement will place an undue cost and labor burden on small companies whose scarce resources are best utilized in building broadband networks.

### **III. REQUEST FOR CLARIFICATION**

Although the matter is not directly addressed in the present NPRM, the SCC seeks clarification on ACP participant eligibility. Per the FCC's website (<https://www.fcc.gov/acp>), "A

household is eligible for the Affordable Connectivity Program if the household income is at or below 200% of the Federal Poverty Guidelines, *or if a member of the household meets at least one of the criteria below* [emphasis added]...” The list then includes participation in the National School Lunch Program (“NSLP”) as one of the criteria that would deem the household eligible to participate in the ACP program.

It is the SCC’s understanding that if a majority of households fall under the required income threshold, then the entire school district is eligible for participation in the NSLP. If this is the case, then it stands to reason that households which may not necessarily require economic assistance due to low household income can receive support through the ACP, as a sort of dragnet inclusion stemming from the National School Lunch Program. If our understanding is incorrect, we would greatly appreciate further clarification on the matter.

#### **IV. CONCLUSION**

The SCC appreciates the Commission’s efforts to make broadband Internet service affordable for all Americans, and we encourage the Commission’s continued work and attention in these important matters.

Respectfully submitted,

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