

March 13, 2017

The Honorable Ajit Pai Chairman Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Dear Chairman Pai,

I am a member of the Executive Committee of the Small Company Coalition (SCC), a consortium of small, rural telecom providers and associated vendors from across the country. On behalf of our membership, I want to extend our sincere congratulations on your appointment as FCC Chairman and your recent renomination for another term by President Trump.

The SCC was formed with the specific intent of working collaboratively with the FCC on issues impacting our ability to provide advanced telecommunications services to Americans in small and remote communities throughout the country. We know that you share our view that such access is vital to almost 50 million Americans. We are grateful for your leadership on behalf of rural communities throughout the country, and commit to assisting you in any manner possible.

Pursuant to this topic, we write to express our views regarding the information collection and reporting requirements under which small companies like ours must labor. In August and November of 2016, we sent letters to former Chairman Wheeler and Commissioner O'Rielly, respectively, detailing our thoughts and recommendations for reducing the regulatory burden on small businesses like ours. We now forward these same recommendations to you for your consideration.

Of course, we fully understand the FCC's oversight responsibilities, and are sympathetic regarding the data inputs necessary for your own internal risk-modeling and policing of waste, fraud and abuse. Indeed, we share your perspective that weeding out such abuse is a primary role of the agency.

From our own on-the-ground experience, however, we wanted to bring to your attention not only how such reporting requirements combine to require substantial labor hours from sparsely-staffed businesses like ours, but also the appreciable financial burden such requirements represent.

Consequently, we forward the attached recommendations for your consideration, as well as a spreadsheet of our internal tally of reporting resource dedication. We trust you will receive them in the spirit in which they are offered.

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Finally, we do have several other business and policy concerns which we would like to discuss with you, and respectfully request a meeting with you at your earliest convenience. Our DC-based representative will follow-up with your office shortly to discuss scheduling such a conversation.

In closing, we reiterate our congratulations on your ascension to Chairman and renomination, and look forward to a much more productive atmosphere for common-sense reform at the FCC. For your information, I can be reached by email at: jjkail@lhtot.com or by telephone at: 724-593-8111.

Thank you for your consideration and I'll look forward to hearing from you.

Respectfully,

James J. Kail

Executive Committee Member

Attachments