



October 7, 2020

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

Dear Chairman Pai,

We write to you on behalf of the Small Company Coalition (SCC), a consortium of incumbent local exchange carriers (ILECs) and vendors serving rural and Tribal territories across the United States. As small telecommunications companies, SCC members provide connectivity to communities whose livelihoods rely on it, now more than ever as our nation copes with the Coronavirus and accompanying restrictions.

In March of this year, you issued the “Keep Americans Connected” pledge, requesting cooperation from broadband companies and seeking their pledge of support to:

- (1) not terminate service to any residential or small business customers because of their inability to pay their bills due to the disruptions caused by the coronavirus pandemic;
- (2) waive any late fees that any residential or small business customers incur because of their economic circumstances related to the coronavirus pandemic; and
- (3) open its Wi-Fi hotspots to any American who needs them.

SCC members eagerly complied, many of whom formally took the pledge and went above and beyond this call to provide service to their communities. In addition to fulfilling the goals outlined in the Pledge, SCC members’ efforts include, but are certainly not limited to, the following:

- Penasco Valley Telephone Cooperative (PVT) in New Mexico has implemented two student programs to ensure connectivity during these months of stay-at-home schoolwork. PVT’s Reconnect to School promotion consists of the first two months of Internet free of charge with no installation fees, contracts, deposits and, as always, no data caps.

The second program, the “Broadband Booster Pilot Program,” is for low-income student households. Prospective enrollees in the program fill out a simple application and, if approved, receive a 50% discount on their monthly Internet bill for 12 months. Customers may reapply at the end of the 12-month period.

- Valley Telephone Cooperative (VTC), based in Texas, has waived installation charges and monthly fees on 25/10 service for homebound K-12 and college students and will continue to honor these commitments until students return to school. For their CLEC fiber and wireless services, VTC has also offered no installation fees and a \$20/month charge for 25/10 service.

- As a Tribal-serving company, Sacred Wind Communications (SWC) faces unique challenges during this time and has taken outstanding measures to meet the needs of their community. SWC has purchased an additional 40 Gbps transport to accommodate growth in network usage while simultaneously reducing monthly charges for 25 Mbps service to students' homes.

SWC has automatically upgraded broadband service from 10mbps to 25mbps, where capacity allows, at no additional charge. They have also installed nine Wi-Fi sites for usage free of charge across Navajo Lands in New Mexico.

Further student-targeted efforts include collaborating with three school districts to map unserved student homes outside of SWC's territory and developing a plan to reach these homes within 6 to 12 months. SWC has also partnered with the Navajo Technical University to provide discounted broadband to all students and faculty outside of their service territory.

Finally, as SWC operates in one of the country's COVID "hotspots," they have gone to great lengths to ensure risk-mitigation by purchasing full-body PPE and cleaning equipment for all of their customer-facing employees and lesser PPE equipment for all employees, including gloves, face-masks, forehead thermometers, cleaning sprays and hand sanitizers.

- The Laurel Highland group of companies, which consists of Laurel Highland Telephone Company, Yukon-Waltz Telephone Company, South Canaan Telephone Company, and Lackawaxen Telecommunications Services, Inc. (collectively referred to as "LHTC"), based in Pennsylvania has taken the following steps to ease the burden associated with the Coronavirus pandemic:
 - (1) waived late charges on past-due balances;
 - (2) established Wi-Fi hotspots, enabling students to connect to their schools' networks;
 - (3) discounted Internet service for customers experiencing hardships resulting from the pandemic; and
 - (4) has not suspended or terminated telephone, TV and Internet services for non-payment of past-due balances.

Naturally, these measures represent only a small portion of the overall actions taken by SCC members across the country and are indicative of the fundamental understanding we have that our companies' success is inextricably linked to the welfare of our communities. As such, our members have readily incurred increased expenditures in deploying more broadband infrastructure, discounted prices, and left delinquent payments uncollected as the country struggles to return to normalcy.

With this in mind, the SCC requests that the Commission consider restoring the funding cuts triggered by the Budget Control Mechanism that took effect July 1, 2020. This would provide a vital mitigating effect on COVID-induced losses sustained by small carriers across the nation and

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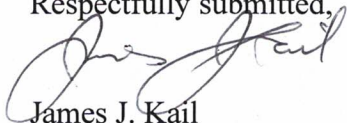
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allow our companies to continue to work hand-in-hand with our customers to cushion shortfalls they may be enduring.

Economic restraints and financial hardship resulting from the lockdowns have lasted far longer than anyone might have initially anticipated, and while their severity varies from state to state, it is unlikely that the country will return to full economic power for the remainder of this year at the very least.

If you have questions concerning this matter or wish to discuss the issues further, I can be reached by email at jjkail@lhtr.net or by telephone at 724-593-8111. Thank you for your time and consideration in this matter and I look forward to further dialogue soon.

Respectfully submitted,



James J. Kail

Executive Committee Member