

**Congress of the United States**  
**Washington, DC 20515**

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May 7, 2014

The Honorable Thomas Wheeler  
Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Dear Chairman Wheeler:

We applaud the Federal Communications Commission (FCC) for its continued interest in modernization of the Universal Service Fund (USF), as well as for its commitment to consider and implement much-needed “course corrections” when changes like the Quantile Regression Analysis prove to be ineffective or even harmful to our nation’s broadband objectives.

The Communications Act of 1934 requires the FCC to establish universal service mechanisms that are both sufficient and predictable in providing support for the deployment and operation of advanced networks. To fulfill this mandate and move forward in modernizing the USF, we are calling upon the FCC to implement a Connect America Fund (CAF) mechanism that is tailored for rural rate-of-return carriers and will support the availability and sustainability of broadband-capable networks in high-cost areas of the United States for the benefit of all Americans.

Wisconsin has the third highest number of Rural Local Exchange Carriers (RLECs) when compared to other states. These Wisconsin based RLECs, both cooperative and commercial, have significant broadband investments and maintain robust fiber networks. However, it is important that we consider the long term commitments of these rural carriers and the contributions they make to our rural communities and their customers. Wisconsin’s rural economy demands and deserves the benefits of a broadband infrastructure for the long run.

As services evolve and technologies advance, many Americans are fulfilling their voice communication needs by using wireless or Voice over Internet Protocol services rather than traditional landline plain old telephone services (POTS). Unfortunately, the current rules governing USF support in areas served by smaller rural carriers do not facilitate such consumer choice. Instead, under the current rules, small rural carriers receive high-cost support only for those consumers that subscribe to POTS. This technical flaw in the rules results in many rural consumers who decline to take POTS facing significantly higher prices for the broadband services they want to keep because USF is lost for the network connections that serve them. This current set of rules, if not addressed and updated in a timely manner that is tailored for the challenges faced by smaller rural carriers, will undermine consumer choice, deter broadband adoption, and inhibit technological evolution.

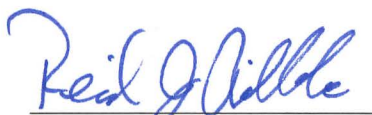
We recognize the complexity of reforming USF distribution mechanisms. The FCC has been working for several years to create a model-based support mechanism for larger carrier operations in high-cost areas, and that work continues. This effort is important for the long-term sustainability and success of the program in many rural areas served by larger carriers, and that work should be completed as soon as possible.

We are pleased that the FCC seems to be moving forward in considering how to set up a CAF program that is tailored for the challenges faced by smaller carriers in serving rural areas. But, with its pending Further Notice of Proposed Rulemaking, the FCC also has now sought comment three times over the past two-and-one-half years regarding how to establish such a CAF program. We hope that the FCC will expeditiously consider the most recent rounds of comments once they are filed and then move with all due speed to update the existing USF mechanisms and provide sufficient and predictable support for smaller carriers' networks even where consumers choose to adopt only broadband services. Prompt action by the FCC is essential to ensure that consumers in all rural areas can choose among high-quality and affordable voice and broadband services consistent with our national universal service objectives.

Sincerely,



RON KIND  
Member of Congress



REID RIBBLE  
Member of Congress



MARK POCAN  
Member of Congress



TOM PETRI  
Member of Congress



GWEN MOORE  
Member of Congress