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Congress of the United States  
House of Representatives

May 28, 2015

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COMMITTEE ON AGRICULTURE  
COMMITTEE ON NATURAL RESOURCES  
COMMITTEE ON VETERANS' AFFAIRS

WCB  
Connect  
America  
CAF

Chairman Tom Wheeler  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

I'm writing today in support of the further waiver application of Allband Communications Cooperative, filed December 31, 2014. Allband is the first Michigan non-profit telephone cooperative, and the only entity to serve the Robbs Creek exchange, a heavily forested rural area comprising parts of Alcona, Alpena, Montmorency and Oscoda counties in northeast Lower Michigan.

The Federal Communications Commission's (FCC's) 2011 *USF/ICC Transformation Order* capped at \$250 per month (\$3,000 per year) the amount of total per-line Universal Service Fund (USF) support a carrier like Allband may receive. The current effect of this cap would be to reduce Allband's USF support by \$352 per-line per month (\$4,221 per-line per year). While Allband was granted a waiver in 2012, that waiver is set to expire on July 1, 2015.

The loss of USF revenues of this magnitude means that Allband would be unable to pay many of its essential operating costs. In addition, Allband would be unable to repay the scheduled interest and principal on its Rural Utilities Service Loan, obtained to fund the construction of its network.

Before Allband commenced service in 2006, no wireline carrier had ever served the area, and cellular service was and remains unavailable or unreliable throughout most of the 177-square mile region. Allband continues to be the only entity willing and able to provide voice and data telecommunications services (including essential public safety services) within the Robbs Creek area during the foreseeable future.

While I certainly understand and agree with the goals of USF reform, I request you consider an exception to the \$250 cap as being warranted in this case. It is my hope that Allband and the FCC will be able to come to an agreement that allows the residents of the Robbs Creek exchange to retain basic telecommunications services. Thank you for your attention to this issue. Please contact Jordan Vivian in my office at (202) 225-4735 with any questions.

Sincerely,

Dan Benishek  
Member of Congress