

Congress of the United States  
Washington, DC 20510

October 29, 2015

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

Dear Chairman Wheeler:

As members of the Washington State Congressional Delegation, we write to you to express our concern about the potential negative impact on the State of Washington that could arise from the Federal Communications Commission's implementation of the Alternative Connect America Cost Model or A-CAM.

Under all versions of A-CAM that have been proposed to date, there is a significant reduction in high-cost support for rural areas in the State of Washington. In fact, the reduction is projected to be over \$ 4 million on an annual basis, or nearly one-third of the 2014 level of support.

In looking at the results from the A-CAM model for Washington state, we are concerned about the efficacy of the model in its current standing.

We have been informed that the A-CAM model, which is applied to rate-of-return companies, was developed using price cap inputs.

As the Commission is fully aware, rate-of-return companies are much smaller than their price cap counterparts and the costs tend to be higher.

Instead of relying on the model as it currently stands, we advocate that any forward looking cost model adopted by the Commission to apply to small rate-of-return companies should be developed in a way that recognizes the unique characteristics of those rate-of-return companies, rather than using data from the larger price cap companies.

We support the goal of developing robust broadband capable networks in rural America, including rural Washington. Such broadband capable networks are the key to economic development and commerce in our rural, agricultural areas. Washington's rate-of-return companies have made great strides in this area, and some offer the fastest Internet speeds available in our state. But there is more work to do and we are concerned that using a mismatched cost model will have the effect of stunting the further development of those broadband capable networks.

We ask that the Commission focus its attention on developing a forward looking cost model using rate-of-return company inputs including as many company-specific inputs as is feasible. We also ask that the Commission invest sufficient time and care to be sure any new

system for new investment be accurate, cost-beneficial, and that the details be fully vetted and transparent.

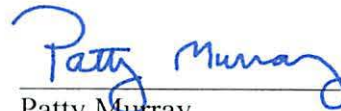
Furthermore, while we recognize that the model is optional, we are also concerned about the uncertainty of alternative FCC proposals that may require carriers to keep two sets of books.

Accordingly we also urge the FCC to adopt a methodology that minimizes the administrative burden on small, rural, rate-of-return companies.

Sincerely,



Maria Cantwell,  
U.S. Senator



Patty Murray,  
U.S. Senator



Suzan DelBene,  
Member of Congress



Rick Larsen,  
Member of Congress



Jaime Herrera Beutler,  
Member of Congress



Dan Newhouse,  
Member of Congress




Cathy McMorris Rodgers,  
Member of Congress



Derek Kilmer,  
Member of Congress



Jim McDermott,  
Member of Congress




Dave Reichert,  
Member of Congress



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Adam Smith,  
Member of Congress



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Denny Heck,  
Member of Congress