

**CONCURRING STATEMENT OF  
COMMISSIONER JESSICA ROSENWORCEL**

Re: *Petition of NTCA—The Rural Broadband Association and the United States Telecom Association for Forbearance Pursuant to 47 U.S.C. § 160(c) from Application of Contribution Obligations on Broadband Internet Access Transmission Services*, WC Docket No. 17-206.

Our high-cost universal service fund program is designed to bring modern communications to rural America. That's a noble goal. But the system we have to do so is not just complex, it's Byzantine. With the advance of time and technology, regulatory reforms have multiplied. As a result, there are real quirks and strange inequities in our rules.

Today we remedy one of them. We grant non-model rural incumbent local exchange carriers forbearance from the universal service contributions related to one component of broadband internet access service.

You got that? Like I said, it's complicated.

I concur in this decision. As a matter of equity, I think it is important to put these carriers on equal footing with their peers. But the analysis in this decision is lacking. Moreover, while I think this is the right call today, I also believe it's time for some basic math. By granting this forbearance, we forego roughly \$40 million in funding for broadband in rural America. Add to this the \$55 million in lost interest income that the FCC just gave up by shifting universal service bank accounts without even a vote and you have nearly \$100 million in universal service funds that have disappeared.

So I don't just worry that our high-cost universal service system is complicated. I worry that despite our noble rhetoric about closing the digital divide in rural America, we are draining this agency of the funds necessary to do so.