

Marlene H. Dortch, Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: Emergency Broadband Benefit Program
WC Docket No. 20-445
Comments

Dear Ms. Dortch:

The undersigned are small fixed broadband providers that serve some of our country's smallest and rural communities – towns that have been hard-hit by the COVID-19 pandemic and rely on our services for broadband access for remote learning, work from home, telehealth, civic participation, and social engagement.

We appreciate Congress' bipartisan passage of Section 904 of the Consolidated Appropriations Act, 2021 that appropriates \$3.2 billion for the Emergency Broadband Benefit Program. This Program will enable broadband providers to obtain reimbursement for discounts passed on to eligible households for broadband services and connected devices. We thank Senate Majority Leader Schumer and Speaker Pelosi for their leadership on this issue and we pledge to work with both Congress and the FCC to help ensure small ISPs like ourselves take advantage of the Program.

As you may gather, we are very interested in participating in this Program. Because it is a reimbursement program – not a subsidy program – it is important that the FCC structure the rules and implement procedures to optimize participation. In considering Congressional intent and the record, we ask the FCC to keep the following principles top of mind:

- The application and reimbursement processes should be simple and straightforward. Wherever possible, the FCC should not require narrative statements or submission of documentation, but should instead rely on participating providers' certifications under penalty of perjury. Requiring excessive resources and administrative overhead for us to participate will deter participation.
- Reimbursement requests must be promptly processed and paid. As small businesses, it may be difficult for us to extend the \$50 discount to a large number of subscribers and have to wait several months before being reimbursed. We rely on cash flow from one month to support our expenses for the next, and a long "float" will discourage participation. The FCC should leverage existing USAC's Lifeline program resources to quickly stand up the election, application, and reimbursement processes, and to efficiently administer the Program.

- As Congress intended, the Program should not favor eligible telecommunications carriers over other participating providers, but should set a common date on which all participating providers can begin offering the financial benefits to eligible households. The Program also must permit participating providers to opt out at any time without recourse, if they find that it is creating cash flow problems or if the small number of eligible households does not justify the costs of provider participation.
- The rules and processes should ensure compliance and accountability through FCC and USAC audit and enforcement authority. This will help ensure that the program is free of waste, fraud, and abuse.

If the FCC's rules reflect these objectives, we are confident that the Program will be successful in encouraging wide participation from broadband providers, for the benefit of consumers affected by the pandemic.

Respectfully submitted,

SPITwSPOTS inc.	Homer	AK
Aristotle Unified Communications	Little Rock	AR
Bolt Internet	Prescott	AZ
Interstate Wireless inc. D/b/a Az Airnet	Tempe	AZ
Tsunami-Wireless	Eureka	CA
unWired Broadband, Inc.	Fresno	CA
Tekify Fiber & Wireless	Hayward	CA
Central Coast Internet	Hollister	CA
OACYS Technology	Porterville	CA
Shastabeam	Redding	CA
Succeed.net	Roseville	CA
Lokket Inc.	San Diego	CA
Conifer Communications, Inc.	Sonora	CA
Rise Broadband	Englewood	CO

Optimus Communications	Grand Junction	CO
ZIRKEL Wireless	Steamboat Springs	CO
WebGears Broadband	Hobe Sound	FL
Myakka Communications, Inc.	Myakka City	FL
Rural Route Broadband, LLC.	Albany	GA
Clik Broadband, LLC.	Ocilla	GA
BTWI Wireless Internet	Perry	IA
Night Owl Wireless, LLC	Walcott	IA
Natel, Inc.	Fairfield	IA`
First Step Internet, LLC	Moscow	ID
Everywhere Wireless	Chicago	IL
Intelligent Computing Solutions	DeKalb	IL
Sonic Spectrum, Inc	Durand	IL
Bspeedy Wireless Inc	Flora	IL
KWISP Internet	Glen Ellyn	IL
ProTek Communications, PLC	Marion	IL
BLIP Networks	Murphysboro	IL
DNA Communications	Rochelle	IL
Volo Broadband	Urbana	IL
Lakeland Internet LLC	Angola	IN
Portative Technologies, LLC	Corydon	IN
RTC Communications	Rochester	IN
Eastern Telephone & Teleworks	Pikeville	KY
Netafy, Inc.	Bridgewater	MA

Omnipoint Technology Inc	Springfield	MA
Quantum Telecommunications, Inc.	Manchester	MD
Michwave Technologies Inc.	Allendale	MI
ISP Management, Inc.	Alma	MI
Internet Service Inc.	Big Rapids	MI
Air Advantage, LLC	Frankenmuth	MI
RuralReach.com	Saline	MI
SyncWave, LLC	Scottville	MI
WiFly Internet Services, LLC	Detroit Lakes	MN
MVTV Wireless	Granite Falls	MN
Northern Network Concepts, Inc.	Little Falls	MN
WON Communications LLC	Springfield	MO
DSLbyAir, LLC	Ocean Springs	MS
Montana Sky West, LLC.	Kalispell	MT
Eastern Carolina Broadband, LLC	Pink Hill	NC
Vistabeam	Gering	NE
BunJul Inc.	Newark	NJ
Straight Shot Wireless	Roswell	NM
Cyber Mesa Computer Systems Incorporated	Santa Fe	NM
NMSURF, Inc.	Santa Fe	NM
Mimbres Communications, LLC	Silver City	NM
Rural Wireless LLC	Lake Tahoe	NV
Hudson Valley Wireless	Albany	NY
Byhalia.net, LLC	Bellefontaine	OH

Wavelinc Communications LLC	BUCYRUS	OH
MetaLINK Technologies, Inc.	Defiance	OH
Speedwavz LLC	Richwood	OH
Southern Ohio Communications Inc.	Waverly	OH
North Coast Wireless Communications	Wellington	OH
Airosurf Communications, Inc.	Edmond	OK
In the Stix Broadband, LL.C	Cresson	PA
SkyPacket Networks Inc.	Jessup	PA
Nittany Media, Inc.	Lewistown	PA
Double Dog Communications, Inc.	York	PA
Interlakes Wireless LLC	Madison	SD
Celerity Networks LLC	Spearfish	SD
AW Broadband	Amarillo	TX
ElektraFi LLC	Buna	TX
Backroads Broadband	Corsicana	TX
Wireless Internet Corporation	Edinburg	TX
SOS Communications	Georgetown	TX
Zeecon Wireless Internet	Marble Falls	TX
Triple Crown Internet, Inc	Plains	TX
Falcon Internet	Salado	TX
CellTex Networks, LLC	San Antonio	TX
Hill Country Broadband Inc	San Antonio	TX
Texoma Communications, LLC	Sherman	TX
Central Link Broadband	Waco	TX

River Canyon Wireless	Moab	UT
InfoWest, Inc	Saint George	UT
Blue Ridge Internet Service Company	Roanoke	VA
FiberXStream	Castle Rock	WA
Columbia Energy, LLC / dba Columbia iConnect	Walla Walla	WA
Bayfield Wireless	Bayfield	WI
SonicNet, Inc.	Eagle River	WI
e-vergent.com, LLC.	Franksville	WI
AirRunner Networks LLC	Marathon	WI
Countrymen Communications Inc	Beaver	WV
Micrologic inc.	Buckhannon	WV
Mountain West Technologies Corporation	Casper	WY