



June 19, 2019

Ex Parte

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: WC Docket No. 06-122; WC Docket No. 10-90; WC Docket 13-184;

Dear Ms. Dortch:

On Tuesday, June 11, 2019, members of the SHLB Coalition met with Ryan Palmer, Trent Harkrader, Bryan Boyle, Johnnay Schrieber, D'wana Terry, Kate Dumouchel, and James Bachtell of the Wireline Competition Bureau to discuss idea of simplifying the application process for obtaining funding from the Universal Service Fund (USF). The SHLB Coalition representatives included Dennis Sampson and Kelleigh Cole (Utah Education and Telehealth Network), Melissa Slawson (GeoLinks), Fred Brakeman (Infinity Consulting), Jeff Mitchell (Fletcher Heald & Hildreth) and the undersigned.

In the meeting, the SHLB Coalition expressed interest in improving broadband coverage and adoption by allowing applicants to submit a single application for USF support to serve schools, libraries, rural health care providers and other entities and consumers who are eligible for support under the Universal Service Fund umbrella. We noted that the National Broadband Plan recommended the use shared networks as a way to aggregate demand and lower the costs for all users. We also noted that the four USF programs each have their own application process, which inhibits the ability of applicants to seek funding from multiple programs at the same time. While the USF programs have similar goals and are intended to work together, the separate application processes create barriers that have caused confusion among applicants, inefficiencies for service providers, funding denials, and resulted in higher costs.

The SHLB Coalition and its members did not suggest changing or combining the existing E-rate and Rural Healthcare programs (though we acknowledged that improvements could be made to the application processes for those programs). We also did not endorse the idea of combining the caps for the E-rate and RHC programs, as recently proposed in the Notice of Proposed Rulemaking, and we did not propose expanding the list of entities eligible for USF support. Rather, the SHLB members suggested the establishment of an additional mechanism – separate and apart from the four existing programs – that would make it easier for applicants to apply for funding from multiple programs using one application.

Sincerely,

A handwritten signature in black ink that reads "John Windhausen, Jr." The signature is written in a cursive style with a small flourish at the end.

John Windhausen, Jr.
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Cc: Ryan Palmer
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