

Attachment—Additional Questions for the Record

**Subcommittee on Communications and Technology
Hearing on
“Strengthening Our Communications Networks to Meet the Needs of Consumers”
October 26, 2021**

Mr. Tim Donovan, SVP, Legislative Affairs, Competitive Carriers Association

The Honorable Bob Latta

1. While the Senate infrastructure bill gives the states discretion on how to award broadband funds, it is clear that the authors of the legislation did not intend to support mobile broadband. Can you talk about some of the work your members have done to expand connectivity during COVID and the missed opportunity it would be not to include mobile broadband as part of the infrastructure discussion?

RESPONSE:

I am proud of efforts by CCA’s members to maintain and expand connectivity to their communities during the COVID-19 pandemic. While many CCA members signed on to the FCC’s Keep Americans Connected Pledge, several have shared that the Pledge was somewhat a formality, as they had already made efforts to ensure customers remain served. As most CCA member carriers are based in the communities they serve, nearly all adjusted their policies and procedures to take care of their customers, neighbors and communities.

Carriers of all sizes introduced service plans and other benefits to assist customers during the pandemic. Many, often at their own expense, made upgrades to community facilities, providing greater access to connectivity for individuals now dependent on online services like telehealth, online education, and remote work. CCA’s carriers accommodated internal policies for the pandemic reality by extending service, waiving invoices, re-activating accounts, cutting prices, and lengthening payment grace periods. For example, one carrier reduced prices on data service and extended data rates by 50%. Another carrier provided free service to specific households identified by working with local schools and provided upgrades to existing customers. Yet another carrier created flexible payment arrangements, eliminated late fees and maintained continuous service without disconnection for failure of payment. They also added extra data to existing accounts to accommodate the monumental shift to working and learning from home.

CCA’s carrier members sought ways to specifically provide the resources needed for e-learning. Many partnered directly with schools and learning institutions to identify and address needs for connecting as many students as possible. One carrier partnered with an equipment vendor to provide a local school with free 5G equipment upgrade and service to a low-income neighborhood. Another rural carrier installed Wi-Fi in central locations for students to use when home connections could not be immediately established and

boosted service at community schools.

Carrier responses to the need for connectivity caused by COVID demonstrate how quickly mobile broadband networks can provide internet access. In areas with existing coverage, individuals could be quickly connected using hotspots and other devices without the need for a truck roll. In other areas, mobile networks were rapidly upgraded or expanded. Through creative spectrum access programs, CCA members were able to enhance network capacity in a matter of days using otherwise fallow spectrum. In another example, VTel, working with Ericsson, was able to deploy new radios and antennas in downtown Rutland, VT to provide mobile service in less than ten days to allow students to access free internet service immediately.

Further, mobile broadband connectivity is the demonstrated choice of consumers. In the context of the Emergency Broadband Benefit program, 67.9% of all enrolled subscribers have selected mobile broadband for their service as of November 1 – over twice the subscription rate of all other service types combined.

As policy discussions regarding infrastructure continue, CCA believes that all consumers must have access to mobile broadband connectivity. Especially with the advances promised by 5G wireless services and innovations that cannot be met with fixed connectivity at any speed, the job of connecting Americans cannot be complete without including mobile broadband.

2. What are some of the barriers to deployment your members face when building or upgrading networks?

RESPONSE:

All wireless carriers must have access to sufficient spectrum resources, a reliable and secure supply chain, and certainty regarding the permitting process, including timing and fees, to deploy and upgrade networks. Disruptions regarding any of these inputs create barriers to deployment.

The Honorable H. Morgan Griffith

1. Have any of your members experienced siting fee disparities in municipalities of similar sizes?
 - a. If yes, are explanations given when delays become exceptionally long?

RESPONSE:

Yes, CCA members have experienced a range of fee disparities in processing applications for approval of wireless deployments. These disparities can be most glaring in jurisdictions that require an applicant to hire specific consultants, including paying significantly higher fees to fund consultant review, even for minor modifications and simple equipment upgrades. Explanations are almost never provided for the required fees.

When there are delays, explanations are generally given, with the reason usually being claims of staffing shortages or incomplete or incorrect application details.

2. Do you believe that if municipalities were required to disclose their fee structures that permitting requirements would become more uniform for the companies operating in multiple jurisdictions?

RESPONSE:

Yes. Upfront, public disclosure of application fees and permitting requirements is necessary for regulatory certainty, both within a jurisdiction and across multiple jurisdictions within a market. Fee schedules are generally publicly available, usually on a website, and most local jurisdictions are aware of fees and practices in surrounding communities and use this information as a point of reference and justification for their own fees and practices. While this is generally the case, right of way access practices may differ.