

September 3, 2025

The Honorable Roger Williams
United States House of Representatives
Chairman, Committee on Small Business
2361 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Nydia Velázquez
United States House of Representatives
Ranking Member, Committee on Small Business
2069 Rayburn House Office Building
Washington, D.C. 20515

Dear Chairman Williams and Ranking Member Velázquez:

Competitive Carriers Association ("CCA")¹ respectfully submits this letter for the record for today's hearing on "Wired for Growth: How Expanding Broadband Can Revitalize Rural Small Businesses." The majority of CCA's carrier member companies are small businesses themselves, whose employees live and work in the rural communities that they serve. Each day, these companies work to preserve and expand connectivity where it would not likely be available otherwise, including for rural small businesses, while facing the challenges of challenging terrain, construction seasons severely limited by weather, and sparse populations. CCA appreciates the Committee's focus on connecting small businesses to high-speed broadband connectivity, and urges continued focus on several issues as this important work continues.

- Universal Service Fund (USF). The USF, created by Congress and administered by the
 FCC, has provided critical support for connecting communities in rural and hard-to-reach
 areas, but updates are needed, especially regarding support for mobile connectivity.
 While the FCC has recognized the importance of USF support for both fixed and mobile
 services, support for mobile carriers to serve rural America has been largely frozen for
 over a decade and has not been tied to the actual costs to deploy and maintain service.
 In particular, as the wireless industry has matured and roaming revenue has decreased
 as part of the business plan to serve rural areas, support for operational expenses
 through USF is critically needed.
 - Indeed, Carolina West Wireless (CWW) recently petitioned the FCC to "begin the process of ensuring that mobile voice and broadband facilities constructed with federal high-cost support can be maintained going forward" with support for

¹ CCA is the nation's leading association for competitive providers and stakeholders across the United States. Members range from small, rural carriers serving fewer than 5,000 customers to regional and national providers serving millions of customers, as well as vendors and suppliers that provide products and services throughout the communications ecosystem.

operational expenses.² Over the years, CWW has seen its networks go from being the exclusive provider in 70 percent of its service area to now 38 percent. Providers like CWW used to be able to rely on three forms of revenue — customers, USF support, and roaming revenue. However, each of those sources has been declining. Now, CWW is subsidizing unprofitable sites that were built with USF support. Without additional funds, CWW will be required to shut sites down, resulting in a loss of coverage, education, health, and emergency services. CWW is far from alone as carriers focused on rural areas across the country face similar challenges and demands for operational support through USF. The FCC should grant CWW's petition and explore relief for the broader industry.

- Broadband mapping. Inaccurate or unreliable broadband coverage data continues to present difficulties for rural carriers. The FCC's coverage maps for mobile service, for example, can overstate coverage and remove areas that should receive support through programs like the USF from eligibility, risking not only further expansion of wireless coverage but even reducing coverage available today. This includes flawed proposals to use outdoor stationary coverage data to make decisions for programs to support mobility. Congress should provide oversight to prevent a "5G Gap" in the United States and to ensure mobile networks are available alongside fixed services to provide ubiquitous connectivity.
- Barriers to deployment. Congress should also consider ways to remove barriers to deployment, including updates to siting and permitting processes for broadband infrastructure. CCA members must secure permits from Federal, State, and local authorities, depending on the area, to deploy, maintain, and upgrade their networks. Current processes for acquiring the necessary permits from various entities can take months or even years, which presents significant burdens for small businesses. Efficient, manageable, and predictable permitting processes would help to promote deployment in rural areas, especially in Western States, where Federal Land Management Agencies control large swaths of land where services are needed, including along critical transit corridors. Congress should act to provide certainty and remove unnecessary costs, time, and challenges in the review process.
- Spectrum auction authority. CCA commends Congress for reinstating the FCC's spectrum auction authority, and Congress has a continued role to play to ensure that our nation's spectrum strategy enables industry innovation and leadership. As the FCC begins to auction more spectrum, it is vital to ensure that spectrum will be available for licensed, full power use by companies of all sizes and those serving rural America by requiring

2

² Petition for Waiver of Carolina West Wireless, LLC; GN Docket Nos. 09-51 and 20-32, WC Docket No. 05-337, WT Docket No. 10-208 at 3 (filed May 31, 2024).

appropriately sized spectrum licenses and sufficient bidding credits for small and rural carriers. There must be a long-term federal strategy to identify and reallocate spectrum for commercial use, with an immediate focus on mid-band spectrum. Wireless carriers need a clear understanding of potential spectrum opportunities as they plan their future auction and network strategies.

• Focus on mobility. While fiber deployment is essential for all communications services, Congress should ensure mobile wireless services are available to power how small businesses and consumers in rural America connect. Farmers and ranchers increasingly rely on wireless connectivity for smart equipment, sensors, and remote monitoring of everything from temperature, moisture, and humidity to soil and animal health. Wireless services also support small businesses through modern, digital payment and streamlined processing and inventory systems, as well as the constant connectivity that allows them to connect with customers, vendors and suppliers providing efficiency and easing workloads. These connections are needed for emergency alerts and will be essential to provide access to the latest emerging technologies, including new artificial intelligence breakthroughs.

CCA's members not only invest in their hometowns and connect their neighbors with the latest broadband services, they are also on the front lines to help their communities recover after disasters and emergency situations. Thank you for considering the importance of broadband connectivity for small businesses, and we welcome further discussion and collaboration to support ubiquitous connectivity.

Sincerely,

Tim Donovan
President and CEO
Competitive Carriers Association