

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

**IN THE MATTER OF POTENTIAL
AMENDMENTS TO STATE RURAL
UNIVERSAL SERVICE FUND RULE 17.11.10
NMAC**

Docket No. 19-00286-UT

COMMENTS OF CTIA

CTIA¹ submits these Comments on proposed amendments to 17.11.10 NMAC (State Rural Universal Service Fund) (the “Proposed Rules”) pursuant to the Order Issuing Notice of Proposed Rulemaking entered in the above-captioned docket on June 3, 2020 (the “Order”) by the New Mexico Public Regulation Commission (the “Commission”).

CTIA appreciates the Commission’s interest in perfecting its State Rural Universal Service Fund (“SRUSF”) rules, including the explicit addition of wireless into the Commission’s definition of broadband internet access service. The current size of the SRUSF is sufficient to support broadband projects that will help New Mexico realize its broadband deployment objectives if expenditures are made prudently. Accordingly, as the Commission continues to refine the SRUSF processes, it should keep the following core principles in mind. First, SRUSF rules should promote efficiency by granting high-cost funding only where it is truly needed, and limiting the overall burden on ratepayers. Additionally, SRUSF rules should promote a competitively and technologically neutral process. Finally, SRUSF rules should promote transparency and accountability to help ensure taxpayers’ money is being spent wisely.

¹ CTIA – The Wireless Association (“CTIA”) (www.ctia.org) represents the U.S. wireless communications industry and the companies throughout the mobile ecosystem that enable Americans to lead a 21st century connected life. The association’s members include wireless carriers, device manufacturers, and suppliers as well as app and content companies. CTIA vigorously advocates at all levels of government for policies that foster continued wireless innovation and investment. The association also coordinates the industry’s voluntary best practices, hosts educational events that promote the wireless industry and co-produces the industry’s leading wireless tradeshow. CTIA was founded in 1984 and is based in Washington, D.C.

Below, CTIA offers a number of concrete suggestions to bring the Proposed Rule in line with these principles. In particular, the Commission should reject the proposal to allow access replacement subsidies for “consumer broadband-only loops,” which would violate a number of statutory provisions. Moreover, the Commission should remove incorporating a fixed residential benchmark rate in its rule, and open a separate proceeding to address the residential benchmark rate or address changes to the residential benchmark rate during its annual determination of the access line charge to ratepayers.

I. THE COMMISSION’S SRUSF RULE REVISIONS SHOULD BE GUIDED BY CORE PRINCIPLES THAT ENSURE ADEQUATE FUNDING FOR BROADBAND UNDER THE CAP

As noted, the SRUSF is currently capped by the Legislature at a maximum size of \$30 million.² The Legislature requires the Commission to allocate at least \$5 million of the SRUSF for broadband and requires companies to spend at least 60 percent of their access-replacement subsidies on broadband.³ After the Commission allocates \$5 million for broadband and allocates funding for Lifeline, access replacement, and other fund requirements, the Commission has discretion to allocate any remaining funds to broadband projects.⁴

Data shows that overall landline telephone connections continue to decrease while broadband adoption has been steadily increasing.⁵ This suggests that changes to the SRUSF should be tailored to ensure that access replacement subsidies limit the broadband funding available from the SRUSF to the least extent possible. The best way to accomplish this is by ensuring that the

² See NMAC 17.11.10.19(C).

³ See NMAC 17.11.10.27(A).

⁴ See NMAC 17.11.10.31(B).

⁵ See, e.g., FCC 2020 Broadband Deployment Report (April 20, 2020), available at <https://docs.fcc.gov/public/attachments/FCC-20-50A1.pdf> (last accessed August 3, 2020).

Commission's SRUSF reforms, including the Proposed Rule, adhere to a set of core principles that promote efficiency and accountability within the SRUSF.

II. THE COMMISSION SHOULD ONLY PROVIDE ACCESS REPLACEMENT SUBSIDIES WHERE THEY ARE TRULY NEEDED AND MAKE THE MOST EFFICIENT USE OF AVAILABLE FUNDING

One guiding principle of SRUSF reforms is that the Commission should strictly limit access replacement subsidies to where they are mandated by statute, and ensure that all SRUSF funds are spent as efficiently as possible in order to ensure that limited SRUSF funding under the cap is used to achieve the greatest possible broadband deployment. As mentioned *supra*, any SRUSF money not spent on legacy access subsidies or other fund requirements, like Lifeline, is money that can be used for forward-looking broadband projects, making efficiency a key to advance the Commission's broadband deployment goals.

A specific revision the Commission can make to support this principle is rejecting the amendment to Rule 17.11.10.9(A)(1) that would set the residential benchmark rate at \$18 by rule. There are a number of flaws with this proposal. First, no justification has been given for this change, which would increase access replacement subsidy funding required to offset decreasing the benchmark, and thus mean less potential funding for broadband projects. In fact, FCC data suggests that the benchmark rate should be even higher.⁶ The Commission should address the benchmark rate in a separate proceeding instead of setting it arbitrarily now; indeed, the Commission acknowledged the significant controversy with the benchmark rate when it set the per-connection surcharge rate for the SRUSF for 2020, suggesting the issue needs a more fulsome

⁶ See FCC 2020 Urban Rate Survey Results (Dec. 5, 2019), available at https://docs.fcc.gov/public/attachments/DA-19-1237A1_Red.pdf (last accessed August 3, 2020) (showing a national urban average voice rate for 2020 of \$34.81).

record.⁷ Additionally, the Proposed Rule would lock the \$18 benchmark rate in with only a “time to time as necessary” review schedule for the Commission, when in reality the benchmark rate should fluctuate based on the market. Setting the benchmark now as a fixed amount within the rule without examining its appropriate level is inappropriate, and failing to require review of the benchmark at regular intervals disincentivizes ensuring an efficient benchmark level to limit access replacement subsidies. Any benchmark rate set in the Commission’s rules should also mandate annual proceedings to analyze applicable data on the benchmark and permit stakeholders impacted by the rate to weigh in.

The Commission should also reject the inclusion of “consumer broadband-only loops” in the Proposed Rule as eligible for access replacement support from the SRUSF.⁸ The New Mexico statute plainly requires that the SRUSF “shall be competitively and technologically neutral, equitable and nondiscriminatory in its collection and distribution of funds, portable between eligible telecommunications carriers.”⁹ Beyond the clear illogic of making lines that would never have generated access charges eligible for access charge replacement, making consumer broadband-only loops eligible for access replacement support would violate this statute in multiple ways.

First, these broadband-only services are not assessable for SRUSF purposes,¹⁰ meaning that companies would receive money for these loops without contributing for them, creating competitive discrimination. And in the event ETCs receiving access replacement subsidies were to recover any lost access lines, they could be *profiting* from the SRUSF funding, a clearly anti-

⁷ See Order Setting State Rural Universal Service Fund Size and Per-Communication Connection Charge for 2020; Order Granting Petition of NMECG, Case No. 19-00210-UT (October 2, 2019).

⁸ See Proposed Rule at Sections 17.11.10.7 (A), (K) (I) and 17.11.10.9.

⁹ NM Stat. §63-9H-6(C).

¹⁰ See NM Stat. §63-9H-6(B).

competitive scenario (and a further violation of the Rural Telecommunications Act (“RTA”), which requires “revenue-neutral” rate rebalancing for carriers.)¹¹ Furthermore, this proposal seeks to prevent former access replacement subsidies from dwindling, violating the statutory requirement for portability by keeping funding levels locked in for some ETCs and preventing distribution to others.

Additionally, this proposal would read the New Mexico statute overbroadly. The RTA uses the term of art “access line” for replacement funding – not access line-equivalent.¹² Even if the Commission were to read “access line” as such, broadband-only loops clearly aren’t equivalent; not only do they not generate access charges, but they are not subject to the other types of regulation that the Commission imposes on access lines, including rate regulation. These differences push consumer broadband-only loops so far away from the definition of “access line” that such a Commission interpretation would be impermissibly overbroad.¹³

Finally, making broadband loops eligible for access replacement funding would exacerbate the issues previously discussed with setting the residential benchmark at \$18 by rule. A benchmark of \$18 for broadband service is artificially, and extremely, low. The cost of broadband services can easily exceed \$40-50 per month for even the lowest tiers of service.¹⁴ For all these reasons, the Commission should reject this proposal.

The Commission should also, to the extent allowable, consider existing funding when judging grants for the broadband program. Proposed Rule 17.11.10.31(A) disallows projects with

¹¹ NM Stat. §63-9H-6(K).

¹² See NM Stat. §§63-9H-6(B), (K)(1).

¹³ See *State ex rel. Sandel v. N.M. Pub. Util. Comm’n*, 1999-NMSC-019, 127 N.M. 272 at para. 7 (stating that while the Commission’s administration of a statute is afforded some deference, the Commission does not have “the authority to pour any meaning it desires into the statute.”)

¹⁴ See, e.g. Whistleout, *Internet Plans in New Mexico*, available at <https://www.whistleout.com/Internet/Search?tab=fixed&address=NM> (last accessed August 3, 2020) (showing that the least expensive landline broadband plan in New Mexico over the Commission’s proposed 25 mbps download threshold for “underserved areas” costs \$40/month).

“full-third party funding” from receiving SRUSF broadband funds, but the list of exceptions in the Proposed Rule that will not be considered “third-party” is so broad (including loans, federal USF support, or “other sources not directly tied to the proposed project”)¹⁵ so as to render that restriction meaningless. In particular, grant applicants should have to show that their SRUSF funding is necessary for the provision of broadband and not already addressed by other funding.

III. THE COMMISSION SHOULD ENSURE THE SRUSF PROCESS IS COMPETITIVELY AND TECHNOLOGICALLY NEUTRAL

Another key principle to help ensure efficient use of limited SRUSF funds is to remove technological hurdles or competitive disadvantages that can serve as barriers to the most effective service in an unserved or underserved area.

Proposed Rules 17.11.10.7 (C) and (D) would raise the speed thresholds for underserved areas (from 10/1 mbps to 25/3 mbps download/upload) and unserved areas (from 4mbps download to 10 mbps download). Increasing the speed thresholds, especially for unserved areas, could limit interested service providers from reaching those areas. It potentially encourages broadband project recipients to invest in upgrades to more populated areas that already have some level of broadband service to the detriment of customers in areas that are truly unserved or underserved. The Commission should weigh whether the increase in minimum speed for SRUSF projects is worth any potential inefficiencies or inequities such limits could cause. Further, the Commission should also consider whether these speed threshold increases are advisable, considering the continued existence of unserved areas in New Mexico.

The Commission should also not delete Rule 17.11.10.6’s clause that SRUSF funding “includ[es] commercial radio services carriers as determined by the commission.” Clarifying that

¹⁵ Proposed Rule at Section 17.11.10.31(A).

wireless carriers may participate in the program will only help ensure that SRUSF goals are met in a competitively and technologically neutral fashion that will benefit all New Mexicans.

IV. THE COMMISSION SHOULD ENSURE TRANSPARENCY AND ACCOUNTABILITY FOR THE SRUSF PROCESS

Finally, the Commission should ensure that the SRUSF application process is as open and transparent as possible, with accountability measures for funding awards and docketed applications on which interested parties are able to comment.

In particular, the Commission should remove Proposed Rule 17.11.10.31 (I)'s "off-season" application program for broadband grants. This provision, which would authorize reimbursement of costs on broadband deployment projects on a retroactive basis, could potentially sidestep the more fulsome review process for broadband applications established by the Proposed Rule. Furthermore, ETCs that made the types of investments described in Proposed Rule 17.11.10.31 (I) made a business decision to do so with full knowledge that SRUSF funding was not then available for the specific projects. Retroactive reimbursement of completed projects will simply reduce the available funding for prospective expansion projects, and contravenes the purpose of the grant program, which is to incentivize new projects in unserved areas that need the funding, not rebate projects that were going to be built regardless. Whether or not the Commission rejects Proposed Rule 17.11.10.31 (I), at a minimum the Commission should make it clear that any SRUSF grants that directly fund capital projects should be treated as grants in aid of construction. As such, only capital costs in excess of funded amounts should be includable in an ETC's rate base to the extent any prospective funding is established on a cost-based, need-based basis.

CTIA is also concerned that the Proposed Rule would eliminate a number of accountability rules for support recipients (such as the revenue reports in 17.11.10.16 and administrative cost

reports in 17.11.10.7(A)). While it is possible that these reports are obsolete from a regulatory perspective, the Commission should ensure they have been adequately replaced to ensure continuing SRUSF oversight is not hindered.

V. CONCLUSION

For all the foregoing reasons, CTIA respectfully requests that the Commission amend the Proposed Rules as set forth above.

Dated: August 3, 2020

Respectfully Submitted,

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I HEREBY CERTIFY that a true and correct copy of CTIA Comments, was sent via e-mail for filing to prc.records@state.nm.us, along to the following parties on August 3, 2020:

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OneStream Networks, LLC
ISC, Inc./Nenture Tech.
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 OneLink Comm., Inc. RM
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 X2Comm, Inc.
 Yucca Coms. Systems L D
 ANPI Business, LLC
 Alltel Comms. of the SW
 Holdings, Inc.
 Smith Bagley Cellular One NE AZ
 PVT Wireless Limited Partnership Northern New Mexico, LP
 T-Mobile West LLC
 CommNet Cellular Inc.
 New Mexico RSA No. 5 LP
 New Mexico RSA 6-1 Partnership
 Verizon Wireless (VA W) LLC
 Sprint Spectrum LP (Sprint PCS)
 Qwest Corporation
 MCI Communications Services
 MCimetro Access Trans. Services
 Tularosa Basin Telephone Co.
 Penasco Valley Telephone Coop.
 New Cingular Wireless PCS
 Dell Telephone Cooperative, Inc.
 PVT Networks, Inc
 LaJicarita Rural Telephone Coop.
 Mescalero Apache Telcom, Inc
 Baca Valley Telephone Company
 Centurytel of the Southwest- NM
 Big River Telephone Company
 ENMR Telephone Coop., Inc
 Leaco Rural Telephone (CLEC)
 AT&T Corp.
 Spectrotel, Inc.
 BT Comms. Sales, LLC
 Telmate, LLC
 Q Link Wireless
 iCore Networks, Inc.
 nexVortex, Inc.
 VoIP Street, Inc. N oIP Innovations
 Intermedia Voice Services, Inc.
 Truphone, Inc.
 Velocity, Greatest Phone Co.
 Axia Technology Partners, LLC
 CTC Communications Corp
 Callcatchers Inc Freedom Voice
 Windstream NuVox, Inc.
 Apptix, Inc.
 Global Crossing Telecom, Inc
 Puretalk Holdings, LLC
 IDT America Corp
 Chit Chat Mobile LLC
 Voice Runner, Inc.
 GC Pivotal, LLC
 365 Wireless, LLC
 Flash Wireless, LLC
 Broadsoft Adaption, Inc.
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Comcast Phone of New Mexico
Cause Based Commerce, Inc
Granite Telecommunications
OnStarLLC
i-wireless. LLC
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Norstar Telecom., LLC
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Broadview Networks, Inc
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Transworld Network, Corp.
Kajeet, Inc
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iNetworks Group, Inc
IP Networked Services
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FreedomPop
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MagicJack SMB, Inc.
TelAgility Corp
Andrew David Balholm
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Republic Wireless, Inc.
Secured Retail Networks, Inc.
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