



November 4, 2021

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

**Re: Ex parte submission in WC Docket No. 13-184, WC Docket No. 02-6, WC Docket No. 09-154, WC Docket No. 06-122, WC Docket 17-84, WC Docket 21-323.**

Madam Secretary:

In accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, this letter provides notice of an oral *ex parte* meeting on Monday, November 1, 2021 between Rachelle Chong, Chair of the SHLB Coalition, and the undersigned, with Commissioner Simington, Marco Peraza, Erin Boone, Adam Cassidy, and Michael Sweeney. We discussed the items below:

- SHLB expressed support for providing E-rate funding for cybersecurity expenses.
- SHLB expressed support for the proposal to expand the base of revenues for the Universal Service Fund (USF) to include broadband internet access revenues. We pointed out that this action could be taken quickly by the FCC under its existing authority while Congress decides whether or not to explore other funding mechanisms. We also recognized that the existing funding regime is discriminatory and unfair to different types of consumers, including low-income consumers who still use voice telephone service and pay into the fund when others using similar services do not.
- SHLB discussed the importance of streamlining the pole attachment process. SHLB said that several of its broadband provider members that serve anchor institutions were discouraged from expanding their service into rural markets because of the high costs of make-ready and pole replacement. While we recognize that electric utilities can and should be allowed to provide broadband so that anchor institutions have more broadband choices, pole owners should not be allowed to charge excessive fees to other broadband providers for accessing those poles, or engage in other discriminatory behavior. SHLB has developed a set of principles that it recommends the FCC consider when resolving pole attachment disputes in the future.
- SHLB informed the Commissioner that it is planning to file a Motion to Intervene in the Sixth Circuit Court of Appeals case challenging the constitutionality of the USF system and SLHB will be supporting the FCC in this case.
- SHLB also said that we are assembling a new group to promote anchor institution broadband connectivity as a way to address the inequities of the digital divide.

Sincerely,

A handwritten signature in black ink that reads "John Windhausen, Jr." The signature is written in a cursive style with a large initial 'J' and a distinct 'r' at the end.

John Windhausen, Jr.  
Executive Director, SHLB Coalition  
1250 Connecticut Ave. NW Suite 700  
Washington DC 20036  
(202) 263-4626