

# Pennsylvania Telephone Association

*"The Communications  
Leader in Pennsylvania"*

**Steven J. Samara**  
President

June 7, 2023

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

Re: Pennsylvania Public Utility Commission Secretarial Letter of March 27, 2023, Regarding a Review of All Jurisdictional Fixed Utilities' Universal Service Programs. Docket No. M-2023-3038944

Dear Secretary Chiavetta:

The Pennsylvania Telephone Association (PTA) submits this correspondence in response to the above referenced Secretarial Letter which was published in the Pennsylvania Bulletin on April 8, 2023.

While the Secretarial Letter cites the mutual goal of the legislature and the rural local exchange carrier (RLEC) members of the PTA of "maintaining universal telecommunications service at affordable rates..." found at 66 Pa. C.S. §3011 (2), much of the focus appears to be on the solicitation of comments regarding the customer assistance programs of non-RLEC public utilities. Nevertheless, the Commission's continued interest in and advocacy for improvements in assisting low-income consumers is a subject on which the PTA can offer some perspectives.

Of particular significance to the PTA member companies are the long-running Lifeline program and the relatively new Affordable Connectivity Program (ACP); eligibility/application/certification/recertification for both run through federal agencies, the Universal Service Administrative Company, and the Federal Communications Commission with respective links to the programs at [www.lifelinesupport.org](http://www.lifelinesupport.org) and <https://getinternet.gov>. The PTA member companies participate in both programs on behalf of their low-income customers, and both programs are receiving scrutiny at the federal level similar to what the Pennsylvania Public Utility Commission (Commission) has framed in this Secretarial Letter.

Discussion at the federal level has centered on a variety of topics including: are potential applicants aware of the low income programs?, do currently enrolled participants meet the program criteria?, if the ACP runs out of money, should it be rolled into the federal Universal Service Fund for support?, and are federal agencies working cooperatively to administer the myriad funding programs designed to bring broadband to all Americans? The PTA actively monitors these discussions and stands ready to comment on behalf of the RLEC industry when appropriate.

The PTA appreciates this opportunity to offer comments and, while this Secretarial Letter does not require additional reporting from the local exchange telecommunications companies, reminds the Commission that any requirement for additional reports other than those listed in 66 Pa. C.S. § 3015(e) must be implemented through the analysis provided for in 66 Pa. C.S. § 3015 (f).

Sincerely,

A handwritten signature in black ink, appearing to read "S. J. Samara", with a long horizontal flourish extending to the right.

Steven J. Samara  
President