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VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

Re: *Rural Digital Opportunity Fund*, WC Docket No. 19-126

Dear Ms. Dortch:

On December 19, 2019, the undersigned on behalf of Frontier, Robert Yates and Johanne Lemay of LYA on behalf of Frontier (by phone), Thomas Whitehead on behalf of Windstream (by phone), and Michael Saperstein on behalf of USTelecom, met with Michael Janson and Jonathan McCormack of the Rural Broadband Auction Task Force and Trent Harkrader, Alexander Minard, Jesse Jachman, and Kirk Burgee of the Wireline Competition Bureau.

We discussed the attached presentation, which explains that when considering network build-out using fixed wireless technologies, an upload target of 20 Mbps likely drives significant additional deployment costs – up to two to three times as high – compared to a 10 Mbps upload target. At the same time, a 20 Mbps upload target provides little to no additional benefits to the end user customer as all key upload use cases, including HD streaming, video conferencing, and gaming can similarly be accomplished with 10 Mbps. By adjusting the upload deployment target from 20 Mbps to 10 Mbps, the Commission can promote competition at the 100 Mbps tier, incentivize additional broadband deployment, and make limited Rural Digital Opportunity Fund dollars reach further. If you have any questions, please contact the undersigned.

Sincerely,

/s/ AJ Burton

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