



March 20, 2020

Chairman Ajit Pai  
Federal Communications Commission  
445 12th St SW  
Washington, DC 20554

Dear Chairman Pai:

On behalf of the nation's local governments, we write to you to request additional assistance and cooperation from the Federal Communications Commission as our communities respond to the ongoing COVID-19 crisis.

We thank the Commission for its swift response to the crisis so far in extending additional flexibility to program participants in Universal Service Fund programs, which are essential resources in the near term, and for your leadership in coordinating voluntary action by the nation's internet service providers. We suggest additional actions that could be taken by the FCC to further alleviate the strain on businesses, families, and local governments caused by the digital divide:

- **Temporarily suspend comment periods during the crisis and extend them for a reasonable amount of time:** Local governments are critical stakeholders for rulemaking activity, and their feedback is vital to good governance. However, these entities are rightly focused for now on ensuring that the basic needs of their residents are met and lack the additional capacity to provide feedback on open proceedings.
- **Expand access to Lifeline:** Students and many workers are attempting to learn and work remotely for the first time, but too many of these households lack in-home broadband service and are cut off from other options of last resort, such as libraries and businesses. Other residents are finding them newly eligible, as they face job loss and income reduction from the economic impacts of the crisis. The FCC should work to loosen participation requirements in Lifeline, streamline the process for onboarding of new participants, and expand awareness of the program for eligible populations.
- **Expand access to telehealth:** Utilization of telehealth options can and should expand during the outbreak, particularly as federal health care programs expand reimbursement eligibility for telehealth services. The FCC should expand funding for the Rural Health Care Program during the current program year and extend filing deadlines to ensure flexibility for providers.

- **Leverage the E-Rate program to reach households:** The E-Rate program has historically been limited to the on-premises facilities of anchor institutions. However, most of these facilities have been forced to close to limit the spread of COVID-19. The FCC should authorize emergency funding through E-Rate and other USF programs to allow for rapidly expanded hot-spot lending to households and allow schools and libraries to offer connectivity to surrounding homes and parking areas during closures without risking E-Rate funding.
- **Encourage additional action from partner ISPs:** We appreciate the actions taken by parties to the Keep Americans Connected Pledge, but we hope those providers will go further. Several companies have taken steps to lift data caps and overage fees, prioritize outreach and connection for educational and healthcare institutions, expand eligibility for low-cost programs, and expand speeds of those low-cost programs, and we hope that all providers will take that action during the crisis.

We appreciate the work of the Commission to respond quickly to an ongoing crisis and to ensure that all residents of our communities can work, learn, participate in their governments, and access healthcare, regardless of household income or location. We are compiling resources for local leaders on our organizations' websites at [www.nlc.org/coronavirus](http://www.nlc.org/coronavirus), [www.usmayors.org/issues/covid-19/](http://www.usmayors.org/issues/covid-19/), [www.naco.org/coronavirus](http://www.naco.org/coronavirus), and [www.natoa.org](http://www.natoa.org). Please do not hesitate to contact us if we may be of further help.

Sincerely,

Clarence E. Anthony  
Executive Director and CEO  
National League of Cities

Matthew Chase  
CEO and Executive Director  
National Association of Counties

Nancy Werner  
General Counsel  
National Association of Telecommunications  
Officers and Advisors

Tom Cochran  
CEO and Executive Director  
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CC: Commissioner Brendan Carr  
Commissioner Michael O'Rielly  
Commissioner Jessica Rosenworcel  
Commissioner Geoffrey Starks