

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of	)	
	)	
Reforming the High-Cost Program for an All-IP	)	WC Docket No. 26-96
Future	)	
	)	
Connect America Fund: A National Broadband	)	WC Docket No. 10-90
Plan for our Future High-Cost Universal	)	
Support	)	

**COMMENTS OF
THE NATIONAL RURAL ELECTRIC COOPERATIVE ASSOCIATION**

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SUMMARY OF ARGUMENT

Many of NRECA's rural electric cooperative members provide symmetrical, gigabit-capacity broadband service, and do so in some of the most rural and sparsely populated areas in the nation. High-Cost programs including CAF II and RDOF were catalysts for much of this investment. NRECA appreciates the Commission's initiative in launching this much-needed High-Cost modernization proceeding.

Any modernization effort must ensure that rural areas are served by reliable, robust and scalable broadband service, with capabilities and rates comparable to that enjoyed by non-rural consumers. The Commission should require any recipient of High-Cost support to provide symmetrical service of at least 100 Mbps that is scalable to meet future demand. A deployment condition tied to a 100/20 Mbps benchmark is contrary to consumer demand and experience and serves only to perpetuate dated and/or sub-par network infrastructure in rural America.

NRECA supports the creation of a new High-Cost program to support ongoing operating costs, as ongoing costs and network sustainability are significant concerns for providers in low-density areas. An operating expenditure support program is a rational and prudent expenditure to ensure that the significant federal investment in rural network development is not wasted and that network infrastructure is not stranded.

NRECA suggests that the existence of unsubsidized terrestrial symmetrical service of at least 100 Mbps in an area should prevent the area from being eligible for capital expenditure or ongoing operating expenditure support. Further, the existence of subsidized terrestrial symmetrical service of at least 100 Mbps – or an enforceable commitment to provide such service (with careful guardrails) – should also preclude additional support in the area.

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The National Rural Electric Cooperative Association (NRECA) submits these comments in response to the Notice of Proposed Rulemaking issued by the Federal Communications Commission (FCC or Commission) in the above-captioned proceeding (“*NPRM*”).¹

I. INTRODUCTION

NRECA is the national service organization for nearly 900 not-for-profit rural electric cooperatives that provide electric power to 56% of the nation’s landmass, including approximately 42 million people in 48 states, or approximately 13 percent of U.S. electric customers. Rural electric cooperatives serve 88% of U.S. counties, including 92% of the 353 counties that experience persistent poverty. Rural electric cooperatives were formed to provide safe, reliable electric service to their member-owners at the lowest reasonable cost. All of NRECA’s electric distribution cooperatives are small business entities as defined by the U.S. Small Business Administration. They are private, not-for-profit entities owned by the members to whom they deliver electricity, democratically governed, and operate according to the seven

¹ *In the Matter of Reforming the High-Cost Program for an All-IP Future*, WC Docket No. 26-96, Notice of Proposed Rulemaking, rel. May 21, 2026 (“*NPRM*”).

Cooperative Principles.²

In addition to providing safe, reliable electric service to their member-owners at the lowest reasonable cost, the nation's rural electric cooperatives are committed to promoting the deployment of advanced telecommunications capabilities in their communities. Today, more than 200 electric cooperatives are involved in broadband deployment efforts, bringing connectivity to areas that other service providers have deemed too costly to serve. Electric cooperatives are playing a crucial role in broadband infrastructure development to serve rural unserved and underserved locations themselves or through partnerships with affiliated or unaffiliated ISPs.

The High-Cost Program's Connect America Fund Phase II (CAF II) and Rural Digital Opportunity Fund (RDOF) Auctions (Auctions 903 and 904, respectively) were the catalysts for most electric cooperatives' start in the broadband business. 32 electric cooperatives won \$250 million in CAF II funds, and 185 electric cooperatives won \$1.5 billion in RDOF funds. These rural electric cooperatives made the commitment to serve their members and communities when few other Internet service providers would – and the Commission, through the High-Cost Program, has been an invaluable partner in this endeavor.

NRECA appreciates the Commission's initiative in launching this much-needed proceeding to modernize its Universal Service Fund High-Cost Programs. In light of major federal and state broadband network investments, including the \$42.45 billion Broadband, Equity, Access and Deployment (BEAD) program, it is appropriate for the Commission to reevaluate the needs and priorities for the High-Cost program support going forward.

² The seven Cooperative Principles are: Voluntary and Open Membership, Democratic Member Control, Members' Economic Participation, Autonomy and Independence, Education, Training, and Information, Cooperation Among Cooperatives, and Concern for Community.

Any such reform effort must continue to ensure that residents in rural areas are not relegated to second-tier broadband service as network demand inevitably continues to increase.

NRECA's Comments focus on the following points:

- 1. Any High-Cost Modernization Effort Must Ensure That Rural Areas Are Served by Reliable, Robust, Scalable Broadband Service.**
- 2. NRECA Supports the Creation of a New Program to Support Ongoing Operating Costs.**
- 3. The Commission Should Require Supported Networks to Provide Symmetrical Service of at least 100 Mbps.**
- 4. The Existence of Terrestrial Symmetrical Service of at least 100 Mbps Should Preclude Support for Competitive Service, and the Commission Should Not Be "Technology Neutral" in its Support Eligibility Determination.**
- 5. Non-Terrestrial Services Are an Insufficient Substitute for Robust Terrestrial Infrastructure.**

II. COMMENTS

- 1. Any High-Cost Modernization Effort Must Ensure That Rural Areas Are Served by Reliable, Robust, Scalable Broadband Service.**

In its *NPRM*, the Commission seeks comment generally on "how a High-Cost Modernization initiative could best ensure that all Americans, particularly those in rural areas, have access to next-generation services...."³ NRECA appreciates the Commission's implicit acknowledgement that rural areas should not be relegated to second-class service, and urges the Commission to make future High-Cost policy decisions with that objective top of mind.

Rural America must have access to reliable and robust broadband service in order to compete economically, create job growth, retain young people, enable distance education and telemedicine, support critical services, and participate in an AI-driven economy. These

³ *NPRM*, ¶ 4.

fundamental criteria require access to a network that is able to provide services comparable to those available in non-rural areas, at comparable rates – and that is scalable to meet ever-increasing downstream and upstream demand. The Commission’s High-Cost modernization initiative should require nothing less in exchange for federal funding support.

Rural areas of the country have historically been relegated to substandard broadband service compared to their urban counterparts. The Commission’s low broadband benchmark exacerbates the problem, lagging behind market realities and consumer demands. In setting the benchmark, there has been an overstated emphasis on what incumbent providers can easily do today – with little consideration given to future consumer needs.

In many rural areas, countless federal dollars have gone to support networks or technologies that do not provide service comparable to that available in urban areas. High deployment costs and low population densities, as well as other challenges associated with building infrastructure in hard-to-reach rural areas, have contributed to the lack of progress in meeting universal service goals. As a result, rural consumers have access to much slower broadband speeds but are charged rates similar to (or greater than) what urban consumers pay for faster service. This is clearly not what was envisioned by Congress in the 1996 Telecommunications Act and does not meet the standard of comparable service at comparable rates set forth in the statute.⁴

2. NRECA Supports the Creation of a New Program to Support Ongoing Operating Costs.

The *NPRM* invites comment on whether modernized High-Cost programs should support capital expenditures, operating expenses, or both.⁵ NRECA welcomes the continuation of capital

⁴ 47 U.S.C. § 254(b)(3).

⁵ *NPRM*, ¶ 23.

support as a component of High-Cost programs and strongly supports the creation of a new program to support operating costs of networks in high-cost areas.

Regarding capital support for network construction – many locations will remain unserved, even after RDOF and BEAD. According to a 2025 Benton Institute for Broadband & Society analysis of FCC data, RDOF support providers have defaulted on \$3.3 billion of the \$9.2 billion in RDOF awards leaving 1.9 million of the original 5.2 million awarded locations – more than one in three – no longer scheduled to receive service.⁶ RDOF defaults are likely to continue – and any locations in areas defaulted on late in the process will have also missed the window for BEAD funding eligibility. BEAD subgrantees, too, are dropping out of the program in meaningful numbers, and BEAD defaults are all but inevitable in the longer term.⁷ While RDOF and BEAD may have reduced the need for future network construction capital expenditure support, High-Cost support of this sort must be maintained to meet the goal of universal broadband availability and fill the gaps where other programs have fallen short.

With respect to operating expense support, generating sufficient revenue to meet ongoing operating expenditures is a significant long-term concern for low population density network operators. For providers that stepped up to bring broadband to the most rural areas of the nation, there is widespread apprehension that they may not be able to indefinitely maintain and upgrade networks while offering service at an affordable rate. As one NRECA member broadband provider, Beacon Broadband, noted:

Our service territory — low density, high mileage per subscriber, difficult terrain

⁶ Benton Institute for Broadband & Society, "New Dataset Reveals Impact of RDOF Defaults on Each State" (analysis of FCC Auction 904 data), 2025.

⁷ See, e.g., Doug Dawson, "Walking Away from BEAD," POTs and PANs, June 22, 2026, *available at* <https://potsandpansbyccg.com/2026/06/22/walking-away-from-bead/> (accessed July 30, 2026); Diana Goovaerts, "Here Are the Latest Signs That BEAD is Falling Apart," Fierce Network, May 27, 2026, *available at* <https://www.fierce-network.com/broadband/bead-already-falling-apart> (accessed July 30, 2026).

— means the ongoing cost of maintaining and upgrading the network is where the real long-term burden sits, not just the initial build. We have already made the [capital expenditure] investment to bring service to these areas; what is missing is a durable mechanism to keep that network operating and upgraded over its full lifecycle.

The end of RDOF support in particular will present a challenge for many carriers, who may need to raise rates in order to cover ongoing operating costs. While other capital expenditure support initiatives, including BEAD, U.S. Treasury Department Capital Projects Fund programs, and USDA ReConnect also enable network development, providers serving areas with the lowest population densities and toughest terrains may face difficulty financing network maintenance and upgrades only using revenue from customer rates once support ends.⁸

Many billions of dollars have been allocated to capital for broadband network construction in recent years, through multiple federal programs. An operating expenditure support program is a rational and prudent expenditure to ensure that the significant federal investment in rural network development is not wasted and that network infrastructure does not become stranded.

The *NPRM* also asks whether the Commission, in enacting an operating expense support program, should require any particular service obligations as a condition of receiving support.⁹ Consistent with NRECA's recommendation below that the Commission require all High-Cost support recipients to provide 100 Mbps symmetrical service or better, NRECA suggests that the

⁸ The BEAD program is of course not a High-Cost Fund program, but a new High-Cost operating expenditure support program could seemingly be made available to qualifying BEAD recipients. Further, the Commission's recent initiative concerning the Schools and Libraries Universal Service Support Program ("E-Rate") may present another potential challenge for rural operator solvency: without the assured revenue associated with E-Rate contracts, some rural providers may be unable to remain commercially viable. *In the Matter of Ensuring Children's Safe Use of Screens and E-Rate-Funded Devices, Modernizing the E-Rate Program for Schools and Libraries*, WC Docket Nos. 26-133, 13-184, Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking, rel. June 26, 2026.

⁹ *NPRM*, ¶ 24.

Commission should similarly condition operating expense support on the provision of at least 100 Mbps symmetrical service.

Finally, NRECA suggests that operating expenditure support should not be available to multiple providers in the same market. Doing so would not be a prudent use of scarce federal resources, and should be fundamentally unnecessary – if another terrestrial High-Cost provider receives operating expenditure support and makes available the requisite robust broadband service, the area is “served,” the capital investment is protected, and no further federal support should be necessary.

3. The Commission Should Require Supported Networks to Provide Symmetrical Service of at least 100 Mbps.

According to Ookla, Americans receive a download speed average of 304.83 Mbps and an upload speed of 58 Mbps through their fixed broadband connections.¹⁰ The Commission itself found that, as of December 2018, 85% of Americans had access to fixed terrestrial service of 250 Mbps/25 Mbps.¹¹ Yet in 2026, the Commission in this *NPRM* asks, timidly, “[i]f we do require deployment obligations, should we require the deployment of ... broadband service at a speed of at least 100/20 Mbps ... consistent with the BEAD and Enhanced A-CAM deployment obligations?”¹²

Alongside a new High-Cost operating expenditure support program, the Commission should require that providers deliver symmetrical service of at least 100 Mbps, via scalable technology, as a condition of support. A “modernized” High-Cost program should not employ an

¹⁰ Ookla Speedtest Global Index, Median Country Speeds Updated June 2026 *available at* <https://www.speedtest.net/global-index> (last visited July 28, 2026).

¹¹ *Inquiry Concerning Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion*, GN Docket No. 19-285, 2020 Broadband Deployment Report, FCC 20-50, pp. 22-23 (2020).

¹² *NPRM*, ¶ 25.

already-dated, years-old benchmark just because it is used in other programs. The 100/20 Mbps definition, as proposed in the *NPRM*, already lags well behind where the market is today.¹³

The vast majority of NRECA member cooperatives that provide broadband already offer a 100 Mbps symmetrical service tier – and do so in extremely rural, sparsely populated areas. For many of our members, it is the very *lowest* speed tier they offer. With the exception of cable multiple system operators and legacy copper networks, the wireline broadband industry offers symmetrical service tiers as a matter of course. Technological developments have consistently trended toward more robust broadband service and will continue to do so.¹⁴ Recent developments in the U.S. residential broadband market evidence a strong trend toward symmetrical broadband connections:

- A recent Rural Broadband Benchmarking Report by NRECA and the National Rural Telecommunications Cooperative (NRTC) shows that nearly fifty percent of residential customers choose broadband speeds exceeding 475 Mbps/475 Mbps.¹⁵ Consumer demand for upload speed is increasing much faster than consumer demand for download, and the number of “power users” is expected to increase at an even faster rate.¹⁶
- According to OpenVault’s Q2 2024 report, average monthly download usage increased 52% over the past four years, while average upload usage *increased by 80%*.¹⁷
- According to OpenVault’s Q2 2025 report – entitled “Picking Up the Pace in Usage and Upstream” – upstream usage grew 17.9% in Q2 of 2025, the fastest second-

¹³ NRECA echoes the Commission’s own Precision Agriculture Task Force 2022 recommendation, stating that the Commission should “[s]et a symmetrical standard of 100/100 Mbps at the field level and 1/1 Gbps to headquarters, farm office, farmhouse or farmstead.” See FCC Precision Agriculture Task Force, *Examining Current and Future Connectivity Demand for Precision Agriculture, Interim Report* – December 2, 2022, available at <https://www.fcc.gov/sites/default/files/connectivity-needs-anticipating-demand-interim-12022022.pdf> (last visited Aug. 27, 2025).

¹⁴ See OpenVault Broadband Insights, *OpenVault 2Q25 Report: Picking Up the Pace in Usage and Upstream*, August 2025, available at <https://openvault.com/resources/ovbi/> (last visited Aug. 24, 2025).

¹⁵ *Rural Broadband Benchmarking Report*, NRTC and NRECA, May 2025, <https://www.nrtc.coop/wp-content/uploads/2025/06/REC-Broadband-Benchmarking-Report-2025-Refresh.pdf>

¹⁶ *Id.*

¹⁷ OpenVault Broadband Insights Report, 2Q24, August 2024, <https://openvault.com/resources/ovbi/> (last visited Aug. 24, 2025).

- quarter upstream growth on record.¹⁸
- In OpenVault’s most recent report from Q2 of 2026 – entitled “Upstream Ascending” - upstream usage grew 19.2% year over year, marking the third consecutive year of accelerating upstream growth.¹⁹
 - A recent Cisco report attributes growth in upstream data usage to AI changing network traffic profiles and behavior. Approximately 9% of AI inference flows carry more upstream than downstream traffic, compared with about 0.5% of typical web traffic. Cisco also projects that AI and agentic AI will increase consumer-driven network traffic by about 6.6x, representing roughly 63% additional growth compared to non-AI scenarios.²⁰

The market for more robust symmetrical broadband service is exemplified by NRECA member service providers. For example, Suwannee Valley Electric Cooperative, in northern Florida, offers a symmetrical 100 Mbps service, symmetrical 1 Gbps service, and symmetrical 2 Gbps service. Similarly, Pierce Pepin Cooperative Services in Ellsworth, Wisconsin (offering broadband under its SwiftCurrent Connect subsidiary) reports that 99.5% of customers receive symmetrical 250 Mbps speeds or higher, with fastest growth occurring in the 500 Mbps symmetrical service tier. *Fewer than 1% of users select the 100 Mbps symmetrical service*, and in fact 100 Mbps service is the budget option available only to qualified low-income households. SwiftCurrent offers no asymmetrical service at all.

Against these market realities, a deployment condition tied to a 100/20 Mbps benchmark is contrary to consumer demand and experience, and serves only to perpetuate dated and/or sub-par network infrastructure in rural America. Simply put, no federal funds should be devoted to build and operate networks that are not scalable to meet growing bandwidth demand. To meet

¹⁸ OpenVault Broadband Insights, *OpenVault 2Q25 Report: Picking Up the Pace in Usage and Upstream*, August 2025, available at <https://openvault.com/resources/ovbi/> (last visited Aug. 24, 2025).

¹⁹ OpenVault Broadband Insights, *2Q26 Report: Upstream Ascending*, 2026, available at <https://openvault.com/resources/ovbi/> (last visited July 30, 2026).

²⁰ Cisco Systems, Inc., *AI Impact on Wide Area Networks: Cisco Report 2026*, 2026, available at <https://www.cisco.com/c/dam/en/us/solutions/collateral/artificial-intelligence/mass-scale-infrastructure/ai-network-traffic-report.pdf> (last visited July 30, 2026).

the statutory requirements of comparable services at comparable rates, the speed benchmark must be set aggressively and updated regularly to keep up with the marketplace.

4. The Existence of Terrestrial Symmetrical Service of at least 100 Mbps Should Preclude Support for Competitive Service, and the Commission Should Not Be “Technology Neutral” in its Support Eligibility Determination.

The *NPRM* asks whether a modernized or new High-Cost program should provide support to serve locations where service is already available, or where there is an enforceable commitment to serve through other programs.²¹ The *NPRM* also asks, “should our determination of a competitor providing qualifying service be technology-neutral, or should we look at the technology used to provide the services, such as whether it is provided by fiber, cable, fixed wireless, or LEO satellite?” On this point, NRECA respectfully suggests that the Commission should *not* be “technology neutral.” The additional emphasis on technological neutrality in federal programs has yielded a shift toward the lowest common denominator, justified as a way to avoid picking technological winners and losers.

But in fact, being “technology neutral” in this context is a fallacy, as it involves treating unequal technologies the same. If certain technologies are incapable of consistently meeting certain service thresholds informed by statutory definitions²² or by consumer choices already being made in the marketplace, they are not equal and do not merit “neutral” treatment as compared to more capable technologies. The simple fact is that fiber optic networks are qualitatively more capable, scalable, and future proof than LEO satellite or other technologies. By ignoring technological realities in favor of the abstract principle of “technology neutrality,”

²¹ *NPRM*, ¶ 33, *et seq.*

²² See, e.g., Drew Garner, *SpaceX Seeks Exemption from Certain BEAD Requirements*, Benton Institute for Broadband & Society, Jan. 27, 2026, available at <https://www.benton.org/blog/spacex-seeks-exemption-certain-bead-requirements> (last visited Aug. 1, 2026) (discussing a letter from SpaceX Senior Counsel Shea Boyd to State Broadband Offices regarding BEAD Subgrant Agreement for Low-Earth Orbit Satellite Providers).

federal programs risk picking winners and losers among consumers instead. By relegating certain populations to subpar service, “technology neutrality” is contrary to the universal service objectives set forth in Section 254 of the Act.²³

With that premise, NRECA suggests that the Commission should not provide High-Cost capital expenditure or operating expenditure support in areas where a terrestrial competitor reliably provides benchmark (symmetrical of at least 100 Mbps) service,²⁴ or where there is an enforceable commitment to provide such service.²⁵ With respect to existing LEO satellite access, the Commission should not allow the availability of service from LEO satellite to preempt High-Cost support for development and operation of a terrestrial network providing symmetrical service of 100 Mbps or better that is scalable to meet future demand.

5. Non-Terrestrial Services Are an Insufficient Substitute for Robust Terrestrial Infrastructure.

The *NPRM* asks, “[h]ow should ubiquitous satellite service affect the establishment of a new high-cost support mechanism?”²⁶ It then includes a passage that almost seems to have been drafted by a LEO satellite provider:

Starlink offers residential broadband service, “Residential Lite,” with a stated download speed of up to 250 Mbps and an upload speed of up to 35 Mbps for \$80 a month, and a “Residential” plan for \$120 a month with a stated typical download

²³ 47 U.S.C § 254(b)(3).

²⁴ Further, the Commission should require consistent evaluation of the level of service a network provides for a provider to continue receiving High-Cost subsidies, especially as it works to achieve “comparable levels of service at comparable rates.” This evaluation should include periodic consideration and reevaluation of whether the competitive broadband market in such areas has changed. While 20 years ago there may not have been a business case to build broadband infrastructure in some rural areas, the competitive broadband landscape today has changed and federal programs should recognize that evolution.

²⁵ NRECA submits that the idea of an “enforceable commitment” needs meaningful guardrails and caveats to prevent gamesmanship. An “enforceable commitment” risks preventing an area from receiving further support with no progress toward construction being made within a reasonable time, and the “commitment” itself may disappear due to default or other circumstance. NRECA urges the Commission to consider adding guardrails to protect against long stretches of ineligibility, only for an area to later be defaulted upon, while missing out on other federal funding opportunities.

²⁶ *NPRM*, ¶ 37.

speed of up to 305 Mbps and an upload speed of up to 40 Mbps (speeds even faster than reported by the Congressional Research Service). In comparison, the Commission provides as much as \$200 each month per location in USF support to underwrite the provision of voice and 25/3 Mbps broadband service by some legacy recipients.²⁷

This passage is misleading. Stating that a LEO satellite service provides service “up to” a given throughput does not make it so, as Ookla statistics make clear.²⁸ Further, the Commission’s USF support for providers offering 25/3 Mbps service does not mean those providers are offering *only* 25/3 Mbps service. Most offer much higher speeds (indeed, many offer “up to” services well in excess of 250 Mbps). The 25/3 Mbps measure cited with respect to existing USF expenditures reflects only the Commission’s own anemic definition of “broadband,” and not what providers are actually offering.

Starlink’s coverage map claims that service is available throughout the United States – including wide swaths of very remote and extremely high-cost areas.²⁹ But in practice there is no “high cost” area in a LEO footprint; all areas are essentially equal cost to serve. If Starlink’s coverage claims are true, then there should be no need for any federal support for a Starlink network. Any support for LEO would be better directed towards offsetting the extremely high cost of consumer premises equipment required to receive the service. Of course, such an action is outside the scope of this proceeding and would be better contemplated in the Lifeline context.

NRECA strongly agrees with most of the sentiments in the *NPRM*’s next paragraph, however:

²⁷ *Id.*

²⁸ “[Ookla] found that nearly 45 percent of Starlink users saw median speeds of 100 [Mbps] download and 20 Mbps upload in the fourth quarter of 2025.” Jake Neenan, “Starlink Speeds Improved in Second Half of 2025: Ookla,” Broadband Breakfast, May 5, 2026, *available at* <https://broadbandbreakfast.com/starlink-speeds-improved-in-second-half-of-2025-ookla/> (accessed July 30, 2026).

²⁹ Starlink coverage map, *available at*: <https://starlink.com/map?view=availability>. *See also* Letter of Space Exploration Technologies Corp, WC Docket Nos. 26-96, 10-90, May 13, 2026.

For the purposes of determining service adequacy and eligibility for high-cost support, should the Commission classify federally supported terrestrial networks such as fiber optic networks as the primary infrastructure for ensuring resilient communications to critical areas? Should we consider non-terrestrial services, while valuable as a secondary and redundant layer, as insufficient substitute for robust primary infrastructure? Would support for such secondary and redundant layers constitute “overbuilding” and a waste of federal resources?³⁰

As noted throughout these Comments, NRECA believes that fiber optic networks represent the most future proof technology, with unparalleled scalability to meet future demand. Investing in non-scalable technologies is not a prudent use of federal funds. While inferior network technologies may have lower upfront deployment costs, fiber is the clear winner in cost over life of the network and ability to meet future demand growth.

III. CONCLUSION

NRECA appreciates the opportunity to submit the above Comments.

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³⁰ NPRM, ¶ 38

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