



SHLB Coalition USF Congressional Policy Meeting Notes

8.12.25

Action Items

- [Comment on USF congressional reform](#) by COB 8/22
 - Sign up for Oct 29-31 – [AnchorNets Conference 2025](#)
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I. USF Litigation

A. Updates from the 5th Circuit

1. Consumers' Research motioned the 5th Circuit for supplemental briefing regarding two sections of Section 254 (47 U.S.C. §§ 254(c)(3) and (h)(2)).
2. SHLB and the government have opposed supplemental briefing. Our argument is that these issues were not originally preserved at court.
3. Unclear as to what the next steps are as we wait for the court's decision. Consumers' may file a new case based on the merits presented in Gorsuch's dissent
4. We continue to retain HWG and expect a response in the next 30-45 days
5. We are following the FCC

B. Consumers' Research Comments for Q4 2025

1. Consumers' also recently filed [comments to the FCC](#) related to the Q4 2025 USF contribution factor. They intend to continue filing new opposition every quarter when new contribution rates are set.
 - a) In their comments, they've included arguments regarding the constitutionality of 47 U.S.C. §§ 254(c)(3) and (h)(2).

II. Senate USF Working Group

A. New [public comment](#) round is open as of the prior Friday

1. Questions are almost exactly the same as those two years ago; this is a good thing, as it allows us to use our previous filing to help guide current recommendations.

B. [Outline version of the new questions and our prior responses](#), open for comments

1. No formal deadline, but adding your feedback by 8/22 would be ideal.
2. Email kcorra@shlb.org with questions

C. Discuss: SHLB's [previous comments](#); what do we need to update?

1. KC and JW are already hard at work marking sections that are out of date, or need to be updated/expanded upon.

2. Areas for expansion: Given our current place, we need more examples of the benefits of USF programs, particularly in the E-Rate and Rural Health Care sections. We'll use our fly-in materials from April to give these sections more specific data
- D. Transparency additions
 1. See our response to the FCC [Delete Delete Delete](#) initiative; we plan to incorporate our recommendations laid out in this proceeding
- E. Contribution reform
 1. Here, our message will revolve around advocating for a fund that is long-term and sustainable
 - a) We're also strongly opposed to it being subject to annual appropriations
 2. Questions and comments:
 - a) —: Emphasis on the fact that the program is being funded by taxes on voice service, and it makes much more sense to look at growing services, such as high-speed broadband. Would like an explicit statement that there needs to be a change and increase in collections.
 - (1) *JW*: Yes, we're explicitly acknowledging that as we did in 2023
 - b) —: Additionally, the Lifeline program needs to be modernized, even if that requires a reduction in criteria.
 - c) —: Ensuring waste does not occur *is* a major part of contribution reform; volunteer to help with rural healthcare call
- F. Lifeline and High Cost comments
 1. Kristen Corra (KC): Our previous comments did not call to modernize Lifeline into an ACP-like program. Instead, we called for a separate, new ACP program into USF. How do folks feed about this approach today?
 2. Questions and comments:
 - a) —: It could be dangerous to equate Lifeline's future with whether or not there is an ACP; as such, it makes sense to keep them separate
 - b) —: USF is stronger with all of the programs
 - c) —: There are opportunities to advocate for anchors within programs like the High Cost fund, so we should advocate within that fund
 - d) —: The demands of many of the for-profit rural funds that rely on USF will hold more weight. West Virginia had very high participation rates in Lifeline.

III. Event Reminders

- A. Oct 29-31 – [AnchorNets Conference 2025](#)
- B. Aug 19 – [Chicago SBLN Reception](#)

SHLB's next USF Congressional policy group call will reconvene on September 9, 2025 at 2:00 pm ET.

CHAT

14:02:36 From Kristen Corra, SHLB to Everyone:

USF Litigation

Updates from the 5th Circuit

Consumers' Research Comments for Q4 2025

Senate USF Working Group

New public comment round is openDiscuss: SHLB's previous comments; what do we need to update?

14:13:57 From Kristen Corra, SHLB to Everyone:

Comment portal: <https://www.fischer.senate.gov/public/index.cfm/usf>

14:14:16 From Kristen Corra, SHLB to Everyone:

Our 2023 comments:

https://assets.noviams.com/novi-file-uploads/shlbc/SHLB_Responses_to_Senate_USF_Working_Group_RFC_-_8_25_23.pdf

14:15:06 From Kristen Corra, SHLB to Everyone:

Here's an outline version of the new questions and our prior responses. You can add your comments here:

<https://docs.google.com/document/d/1ATSkkTetArWt2zP-vlrYmPicvllRKz9oTpMCRbrPU7Y/edit?tab=t.0>

14:18:53 From to Everyone:

{3C6C9B73-88A9-43F0-9541-8F604FBADF72}.png

14:19:54 From Elle Thompson (she/her) to Everyone:

Replying to "{3C6C9B73-88A9-43F0-9541-8F604FBADF72}.png":

where can we find this map online? Want to make sure it ends up in notes

14:39:37 From to Everyone:

What is your timeline for comments from members?

14:40:24 From Joey to Everyone:

No formal deadline, but by 8/22 would be ideal.

14:47:23 From to Everyone:

Yes, and... :)

14:48:38 From Kristen Corra, SHLB to Everyone:

Replying to "No formal deadline, but by 8/22 would be ideal.":

8/22 would be a good target. Then we can draft and have time to send out the draft for comment prior to the deadline

14:51:02 From Joey to Everyone:

<https://www.shlb.org/events/anchornets-conference-2025>

14:51:20 From Joey to Everyone:

<https://www.shlb.org/chicago-sbln-reception>

14:52:32 From to Everyone:

I joined late- could you share the doc again?

14:52:54 From to Everyone:

<https://docs.google.com/document/d/1ATSkkTetArWt2zP-vlrYmPicvIIIRKz9oTpMCrbrPU7Y/edit?tab=t.0>

14:54:01 From to Everyone:

They just announced a new tariff on anchornet registrations. Get in now!!!