



C O N S U L T I N G L L C

5904 Devonshire Dr.
Bethesda, MD 20816
240.461.7816

February 14, 2022

Via E-Filing – Notice of Ex Parte Communications

Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

**Re: *Report on the Future of the Universal Service Fund, WC Docket No. 21-476;*
*Universal Service Contribution Methodology, WC Docket No. 06-122***

Dear Ms. Dortch:

On behalf of the Ad Hoc Telecom Users Committee, INCOMPAS, NTCA – The Rural Broadband Association, Public Knowledge, the Schools, Health & Libraries Broadband (SHLB) Coalition, and the Voice on the Net Coalition, I am submitting a letter from 332 entities representing a broad and diverse group of stakeholders, including public interest groups, communications companies, anchor institutions, and consumers that collectively are urging the Federal Communications Commission (Commission) to take immediate action to reform and stabilize the funding mechanism that supports the Universal Service Fund (USF). The “Call to Action” letter urges the Commission to expand the services that pay into the USF to include broadband internet access services (BIAS). I also am submitting into the record of the above-captioned dockets the *USForward* report that I published in 2021, which concludes that including BIAS revenues in the contribution base would lower the USF contribution factor to less than 4% for the foreseeable future.¹

The USF is under significant duress because the mechanism that pays for these important programs has not been modernized despite much more recent updates to the services that the programs support. As a result, we have seen the contribution factor rise significantly, and it could reach 40% in just four years if action is not taken. As explained in the *USForward* report, including BIAS revenues in the contribution base is smart and equitable public policy that the FCC can implement quickly. There are several reasons for the Commission to move forward with USF contribution reform now. Here’s why:

First, the current funding mechanism is not sustainable. In the last two decades, the revenues subject to USF assessment have declined by 63%, which has led to a 400%-plus increase in the contribution factor

¹ Matthey Consulting, *FCC Must Reform USF Contributions Now: An Analysis of the Options* (Sept. 2021).

over that same period. This increase is unreasonable, unsustainable, and inequitable for providers and their customers. Indeed, the dramatic decline in assessable revenues has continued since the *USForward* report was published five months ago. As can be seen in the Commission's quarterly announcements of the proposed contribution factor, the adjusted contribution base for the last four quarters (Q2 2021 through Q1 2022) has declined more than 10% compared to the previous four quarters (Q2 2020 through Q1 2021). Stabilizing the USF is not a new issue, but what has made reform urgent is the increased (and continuing) instability of the funding mechanism at a time when broadband access has never been more important. Promoting the deployment, sustainability, and affordability of communications networks and services is how we help connect rural and low-income consumers, schools, libraries, and rural health care providers.

Second, expanding the current revenues-based system to include BIAS mitigates gamesmanship and promotes transparency by removing incentives of providers to arbitrarily allocate revenues from bundled services to one service and not the other. It would not require the development of complicated and untested reporting regimes to implement. This modification would lower the current USF assessment on voice service, resulting in a more equitable contribution system. Moreover, the small assessment on BIAS would not impact consumer broadband adoption.²

Third, there is significant and diverse support for the Commission to act fast to stabilize the USF. No proposed solution for USF reform will be perfect, but the Commission should not wait any longer. Time is of the essence. The calls for action are only getting louder. It is time to modernize the USF contribution methodology and sustain the USF for the future.

Please do not hesitate to contact the undersigned if there are questions regarding this submission.

Respectfully submitted,

/s/

Carol E. Matthey
Principal
Matthey Consulting, LLC

cc: Office of Chairwoman Jessica Rosenworcel
Office of Commissioner Brendan Carr
Office of Commissioner Geoffrey Starks
Office of Commissioner Nathan Simington
Kris Monteith, Chief, Wireline Competition Bureau
Jodie Griffin, Chief, Telecommunications Access Policy Division
Karen Sprung, Deputy Division Chief, Telecommunications Access Policy Division
Charles Eberle, Assistant Division Chief, Telecommunications Access Policy Division

² See Letter from Michael R. Romano, Senior Vice President, NTCA – The Rural Broadband Association, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 06-122 (filed May 11, 2020) (submitting a report prepared by the Berkeley Research Group, *NTCA-USF Study, Expert Report of Michael A. Williams and Wei Zhao* (dated May 7, 2020), that found a modest USF assessment on broadband service would have no material impact on broadband adoption and retention).

REPAIRING THE FCC's UNIVERSAL SERVICE FUND CONTRIBUTION MECHANISM

A CALL TO ACTION

February 14, 2022

To Broadband Policymakers:

The federal Universal Service Fund (USF) is one of the nation's most important programs designed to address the digital divide and connect families, small businesses, and communities in need of critical communications services. Indeed, it enables the deployment and operation of broadband-capable networks and ensures the availability of more affordable services in rural America. It also supports the connectivity of schools, libraries, rural healthcare providers, and low-income families.

Unfortunately, this universal service system is in danger of collapse because the mechanism that funds it has not been updated since it was adopted nearly 25 years ago. As a result, the USF fee has spiraled from about 7% in 2001 to over 30% in 2021 and could exceed 40% in the coming years. The existing system is also inequitable and discriminatory because some consumers pay a disproportionate amount compared to others, even when using similar services.

The undersigned organizations support immediate action to reform and stabilize the funding mechanism that supports the USF by expanding the list of services that pay into it to include broadband internet access services (BIAS). A 2021 report called [USForward](#) by USF expert Carol Matthey finds that including BIAS revenues would lower the USF fee to less than 4% for the foreseeable future. The report also suggests that assessing BIAS is reasonable because most USF funds are used to expand the availability and affordability of that service. An [economic analysis](#) released in 2020 determined that the imposition of a relatively small assessment on BIAS to support USF would have no material impact on broadband adoption and retention. To the extent there are concerns about the impact of such reform on the most vulnerable populations, such concerns can be addressed by tailored measures to protect low-income households.

Our recommendation would reduce regulatory uncertainty, would better reflect evolving uses of services, would be straightforward to administer, and would be more equitable and nondiscriminatory for residential and business consumers than the current system. Moreover, the Federal Communications Commission could make this change under its existing authority without requiring new legislation.

The undersigned parties represent a broad swath of stakeholders, including public interest groups, communications companies, anchor institutions, and consumers. Despite these diverse perspectives, we share a common interest in the broad statutory mission of universal service, in the viability and sustainability of the USF, and the predictability that both residential and business consumers need. When it comes to reform of this critical mechanism, the perfect should not be the enemy of the better—improvements to the contribution mechanism should not be deferred or declined simply because other reform options may warrant further examination. We therefore urge policymakers to preserve the long-term stability of our universal service system and help solve the

digital divide by reforming the USF funding mechanism to include BIAS revenues as soon as possible.

Sincerely,

Public Interest Organizations

- California Emerging Technology Fund, Concord, CA
- California IT in Education (CITE), Sacramento, CA
- Communication Workers of America, Washington, DC
- Gigabit Libraries Network, Sausalito, CA
- National Digital Inclusion Alliance, Columbus, OH
- Public Knowledge, Washington, DC
- Schools, Health & Libraries Broadband (SHLB) Coalition, Washington, DC

Residential and Business Consumer Organizations

- 2600Hz, San Francisco, CA
- Ad Hoc Telecom Users Committee
- Telecom Training Corporation, Nashville, TN

Trade Associations

- Alaska Telecom Association, Anchorage, AK
- Albany Mutual Telephone Association, Albany, MN
- American Library Association, Chicago, IL
- Association of TeleServices International (ATSI), Saint Paul, MN
- Broadband Association of North Dakota, Mandan, ND
- Chamber of Progress, Washington, DC
- Cloud Communications Alliance, Delray Beach, FL
- Colorado Hospital Association, Greenwood Village, CO
- Colorado Telecommunications Association, Denver, CO
- Communications Coalition of Kansas, Topeka, KS
- CoSN, the Consortium for School Networking, Washington, DC
- Iowa Communications Alliance, West Des Moines, IA
- INCOMPAS, Washington, DC
- Indiana Rural Broadband Association, Rochester, IN
- Information Technology Industry Council (ITI), Washington, DC
- Kentucky Telecom Association, Frankfort, KY
- Minnesota Telecom Alliance, St. Paul, MN
- Montana Telecom Association, Helena, MT
- NTCA – The Rural Broadband Association, Arlington, VA
- Rural Wireless Association, Washington, DC
- South Carolina Telephone and Broadband Association, Columbia, SC
- South Dakota Telecommunication Association, Pierre, SD
- Telecommunications Association of Maine, New Gloucester, ME
- Tennessee Broadband Association, McMinnville, TN
- Texas Telephone Association, Austin, TX
- Urban Libraries Council, Washington, DC
- Utah Library Association, Salt Lake City, UT

- Utah Rural Telecom Association, Salt Lake City, UT
- Voice on the Net Coalition, Washington, DC
- Wisconsin State Telecommunications Association, Madison, WI
- WTA – Advocates for Rural Broadband, Washington, DC

Anchor Institutions (Schools, Libraries, Healthcare Providers, etc.)

- Alaska State Library, Juneau, AK
- Asbury Park Free Public Library, Asbury Park, NJ
- Asotin County Library, Clarkston, WA
- Chief Officers of State Library Agencies (COSLA), Lexington, KY
- Connections Telehealth Consortium, Bangor, ME
- Fresno Unified School District, Fresno, CA
- Friday Institute for Educational Innovation, Raleigh, NC
- High Desert Education Service District, Redmond, OR
- Imperial County Office of Education, El Centro, CA
- Kansas City Public Library, Kansas City, MO
- New England Telehealth Consortium, Bangor, ME
- San Jose State University School of Information, San Jose, CA
- Steamboat Springs School District, Steamboat Springs, CO
- Utah State Library Division, Salt Lake City, UT
- Washington State Library, Olympia, WA
- Westchester Library System, Elmsford, NY

Broadband Service Providers

- 3 Rivers Communications, Fairfield, MT
- Alaska Telephone Company, Bettles Telephone, Inc. and North Country Telephone, Inc., Wasilla, AK
- Alenco Communications, Inc., Joshua, TX
- Alliance Communications, Garretson, SD
- Allstream Business US, LLC, Vancouver, WA
- Amery Telcom, Amery, WI
- Arctic Slope Telephone Association Cooperative, Inc. , Anchorage, AK
- ATC Communications, Albion, ID
- Baca Valley Telephone Co., Inc., Des Moines, NM
- Ballard Rural Telephone Cooperative Corporation, Inc., La Center, KY
- BBT, Alpine, TX
- Beehive Telephone Co., Inc., Nevada, Lake Point, UT
- BEK Communications Cooperative, Steele, ND
- Ben Lomand Connect, McMinnville, TN
- Benkelman Telephone Company, Wauneta Telephone Company, Hartman Telephone Exchanges, Inc., Benkelman, Nebraska
- Benton Cooperative Tel Co, Rice, MN
- Beresford Municipal Telephone Company, Beresford, SD
- Bloomingdale Communications, Inc., Bloomingdale, MI
- Blue Valley Tele-Communications, Inc., Home, KS
- BPS Telephone, Bernie, MO

- Bulloch County Rural Telephone Cooperative, Inc., Statesboro, GA
- Cap Rock Telephone Cooperative, Inc., Spur, TX
- Cascade Communications Company, Cascade, IA
- Central Arkansas Telephone Cooperative, Inc., Bismarck, AR
- Central Oklahoma Telephone Co., L.L.C., Davenport, OK
- Chequamegon Communications Cooperative dba. Norvado, Cable, WI
- Cheyenne River Sioux Tribe Telephone Authority, Eagle Butte, SD
- Christensen Communications Company, Madelia, MN
- Citizens Mutual Telephone Cooperative, Bloomfield, IA
- Citizens Telephone Cooperative, Inc. DBA: Citizens Connected, New Auburn, WI
- Citizens Telephone Corporation, Warren, IN
- City of Ketchikan, KPU Telecommunications, Ketchikan, AK
- Clay County Rural Telephone Cooperative/Endeavor Communications, Indiana
- Clear Lake Independent Telephone Company, Clear Lake, IA
- Coleman County Telephone Cooperative Inc., Santa Anna, TX
- Colorado Valley Telephone Cooperative, Inc., La Grange, TX
- Community Telephone Company, Windthorst, TX
- Consolidated Companies, Lincoln, NE
- Consolidated Telcom, Dickinson, ND
- Cooperative Telephone Company, Victor, IA
- Copper Valley Telecom & Copper Valley Wireless, Valdez, AK
- Craigville Telephone Company, Inc., Craigville, IN
- CTC, Brainerd, MN
- Cunningham Telephone Company, Inc., Glen Elder, KS
- Custer Telephone Cooperative Inc., Challis, ID
- Danville Mutual Telephone Company, Danville, IA
- Diller Telephone Company, Diller, NE
- Direct Communications/Star Telephone, Rockland, ID
- DTC Communications, Alexandria, TN
- Dumont Telephone Company, Dumont, IA
- East Buchanan Telephone Cooperative, Winthrop, IA
- Ellington Telephone Co, Ellington, MO
- Emily Cooperative Telephone Company, Emily, MN
- F&B Communications, Wheatland, IA
- Farmers Independent Telephone Company, Grantsburg, WI
- Farmers Mutual Communications, Moulton IA
- Farmers Mutual Telephone Company, Fruitland, ID
- Farmers Telecommunications, Rainsville, AL
- Farmers Telephone Cooperative, Inc., Kingstree, SC
- Federated Telephone Cooperative, Chokio, MN
- Fenton Cooperative Telephone Company, Fenton, IA
- Filer Mutual Telephone Company, DBA TruLeap Technologies, Filer, ID
- Five Area Telephone , Muleshoe, TX
- Foothills Rural Telephone Cooperative Corp Inc, Staffordsville, KY
- Garden Valley Technologies, Erskine, MN
- GBT-Golden Belt Telephone Association Inc., Rush Center, KS

- Geetingsville Telephone Company, Inc., Geetingsville, IN
- Glenwood Telephone Membership Corporation, Blue Hill, NE
- Golden West Telecommunications, Wall, SD
- Gorham Telephone Company, Gorham, KS
- Granite State Communications, Weare, NH
- Granite Telecommunications, LLC, Quincy, MA
- Great Plains Communications, Blair, NE
- Green Hills Communications, Breckenridge, MO
- GRM Networks, Princeton, MO
- H&B Communications, Holyrood, KS
- Hardy Telecommunications, Inc., Lost River, WV
- Harrisonville Telephone Company, Waterloo, IL
- Hart Telephone Company, Hartwell, GA
- Heart of Iowa Communications Cooperative, Union, IA
- Hemingford Coop Telephone Co., Hemingford, NE
- Hill Country Telephone Cooperative, Inc. (HCTC), Ingram, TX
- Home Telephone Co., Saint Jacob, IL
- Hubbard Cooperative Telephone Association, Colo, IA
- Huxley Communications Cooperative, Huxley, IA
- Interactive Services Network, Inc DBA IPFone, North Miami, FL
- InterBel Telephone Cooperative, Eureka, MT
- Interstate Telecommunications Cooperative, Inc., Clear Lake, SD
- ITS Telecommunications Systems, Inc., Indiantown, FL
- Kalida Telephone Co., Kaalida, OH
- Kalona Cooperative Technology Company, Kalona, IA
- KanOkla Networks, Caldwell, KS
- KanREN, Inc., Lawrence, KS
- Kennebec Telephone Co., Inc., Kennebec, SD
- Kerman Telephone Co / Foresthill Telephone Co. (dba Sebastian), Kerman, CA
- Kingdom Telephone Company, Auxvasse, MO
- KMTelecom, Kasson, MN
- Lakeland Communications, Milltown, WI
- La Ward Telephone Exchange, Inc., La Ward, TX
- Lehigh Valley Coop Telephone Association, Lehigh, IA
- Lennon Telephone Company, Lennon, MI
- LightStream, Buffalo, IN
- Lincoln Telephone Company, Inc., Lincoln, MT
- Link Oregon, Portland, OR
- Logic Networks, Tampa, FL
- Lone Rock Cooperative Telephone Company, Lone Rock, IA
- Loretto Telecom, Loretto, TN
- Lost Nation-Elwood Telephone Company, Lost Nation, IA
- LTC Connect, Auburn, KY
- Lumos/NorthState, Waynesboro, VA
- Lynxx Networks, Camp Douglas, WI
- Madison Telephone, LLC, Madison, KS

- Mainstay Communications, Henderson, NE
- Marne & Elk Horn Telephone Company, Elk Horn, IA
- Matanuska Telecom Association, Inc., Palmer, AK
- McDonough Telephone Cooperative, Colchester, IL
- MCNC, Research Triangle Park, NC
- Midstate Communications, Kimball, SD
- Minburn Communications, Woodward, IA
- Missouriicom, Seneca Telephone, Ozark Telephone, Goodman Telephone, ARK-O Holdings, New Florence, MO and Seneca, MO
- Mobile Citizen, Boulder, CO
- Monon Telephone Company Inc., Monon, IN
- Mosaic Technologies, Cameron, WI
- NCC, Ray, ND
- NC Telehealth Network Association, Concord, NC
- Nelson Communications Cooperative, Durand, WI
- NEMR Telecom, Green City, MO
- New Lisbon Telephone Company and Pennsylvania Telephone Company, New Lisbon, IN
- Newport Telephone Company, Inc., Newport, NY
- NineStar Connect, Greenfield, IN
- Nortex Communications, Muenster, TX
- North Central Telephone Cooperative, Inc., Lafayette, TN
- North Texas Telephone Company, Byers, TX
- Nsight Telservices, Green Bay, WI
- Oklatel Communications, Dustin, OK
- Oneida Telephone Exchange, Oneida, IL
- Oran Mutual Telephone Co, Oran, IA
- Oregon Telephone Corporation, Mt Vernon, OR
- OTZ Telephone Cooperative, Kotzebue, AK
- Palmer Mutual Telephone Company, Palmer, IA
- Palmetto Rural Telephone Cooperative, Inc., Walterboro, SC
- Panora Communications Cooperative, Panora, IA
- Park Region, Underwood, MN
- Paul Bunyan Communications, Bemidji, MN
- PC Telcom, Holyoke, CO
- Penasco Valley Telephone Cooperative, Inc., Artesia, NM
- Peoples Rural Telephone Cooperative, McKee, KY
- Perry-Spencer Rural Telephone Cooperative d/b/a PSC, St. Meinrad, IN
- Piedmont Rural Telephone Cooperative, Laurens, SC
- Pine Belt Telephone & Wireless, Arlington, AL
- Pineland Telephone Cooperative, Inc., Metter, GA
- Pioneer Communications, Ulysses, KS
- Pioneer Telephone Company, LaCrosse, WA
- Pioneer Telephone Cooperative dba Pioneer Connect, Philomath, OR
- Plainview Telephone Company, Plainview, NE
- Planters Rural Telephone Cooperative, Newington, GA

- Poka Lambro Telephone Cooperative, Wilson, TX
- Polar Communications Mutual Aid Corp, Park River, ND
- Ponderosa Telephone; Table Top Telephone, O'Neals, CA; Ajo, AZ
- Prairie Grove Telephone Company, Prairie Grove, AK
- Premier Communications, Sioux Center, IA
- PTCI, Guymon, OK
- Rainbow Communications, Everest, KS
- Randolph Telephone Membership Corporation, Asheboro, NC
- Range, Forsyth, MT
- RC Technologies, New Effington, SD
- Readlyn Telephone Company (dba RTC Communications), Readlyn, IA
- Ridgeville Telephone Company, Ridgeville Corners, OH
- River Valley Telecommunications Coop, Graettinger, IA
- Rochester Telephone Company, Rochester, IN
- Roggen Telephone Cooperative Company, Roggen, CO
- Runestone Telecom Association, Hoffman, MN
- S&T Telephone Association, Brewster, KS
- Sacred Wind Communications, Inc, Yatahey, NM
- Sandhill Telephone Cooperative, Jefferson, SC
- Santa Rosa Telephone Cooperative, Vernon, TX
- Santel Communications Cooperative, Woonsocket, SD
- SCTC, Stayton, OR
- SEI Communications, Dillsboro, IN
- Shawnee Communications, Equality, IL
- Siskiyou Telephone Company, Etna, CA
- SkyLine Membership Corporation, West Jefferson, NC
- Solarus, Wisconsin Rapids, WI
- South Central Telephone Association, Inc (KS & OK), Medicine Lodge, KS
- South Plains Telephone Cooperative, Inc, Lubbock, TX
- South Slope Cooperative Communications Company, North Liberty, IA
- Southeast Nebraska Communications, Inc., Falls City, NE
- Southern Montana Telephone, Wisdom, MT
- Southwest Texas Communications, Rocksprings, TX
- Springport Telephone Company, Springport, MI
- SRT Communications, Inc., Minot, ND
- STRATA Networks, Roosevelt, UT
- Sun Corridor Network, Tucson, AZ
- TDS Telecom, Madison, WI
- Telephone Service Company, Wapakoneta, OH
- Templeton Telephone Company, Templeton, IA
- Texoma Communications, LLC dba TekWav, Sherman, TX
- Thacker-Grigsby Communications, Hindman, KY
- Three River Telco, Lynch, NE
- Tohono O'odham Utility Authority, Sells, AZ
- Totelcom Communications LLC, De Leon, TX
- Triangle Communications, Havre, MT

- Tri-County Communications Cooperative, Inc., Strum, WI
- Trilogy 5G, Inc., Irving, TX
- TrioTel Communications, Inc., Salem, SD
- Twin Lakes Telephone Cooperative, Gainesboro, TN
- Twin Valley Telephone & Southern Kansas Telephone, Miltonvale, KS
- United Communications, Langdon, ND
- UniTel, Inc., Unity, ME
- Upsala Cooperative Telephone Assn., Upsala, MN
- USConnect, Bedford, NH
- Valley Telephone Cooperative, Inc., Raymondville, TX
- Valley Telephone Cooperative, Inc., Willcox, AZ
- Venture Communications Cooperative, Highmore, SD
- Viola Home Telephone Company, Viola, IL
- Voqal, Boulder, CO
- Wabash Communications CO-OP, Louisville, IL
- Wahkiakum West Telephone Co., Rosburg, WA
- Waitsfield and Champlain Valley Telecom, Waitsfield, VT
- WANRack, Overland Park, KS
- Webster-Calhoun Cooperative Telephone Association, Gowrie, IA
- Wellman Cooperative Telephone Association, Wellman, IA
- West Carolina Rural Telephone Cooperative, Abbeville, SC
- West Central Telephone Association, Sebeka MN
- West Wisconsin Telcom, Co-op, Inc., Downsville, WI
- Western Iowa Networks, Breda, IA
- Western Iowa Telecommunications, Lawton, IA
- Wes-Tex Telephone Cooperative, Inc., Stanton, TX
- Wheat State Technologies, Udall, KS
- Wiggins Telephone Association, d/b/a Blue Lightning, Wiggins, CO
- Wilkes Communications / RiverStreet Networks, Wilkesboro, NC
- Wittenberg Telephone Company, Wittenberg, WI
- WTC, Wamego, KS
- YK Communications, Ganado, TX

Others

- ADS Advanced Data Services, Inc., Mount Pleasant, TX
- AdTec, Centerville, Indiana
- Arizona Department of Education, Phoenix, AZ
- Alianza, Pleasant Grove, UT
- Bandwidth Inc., Raleigh, NC
- Channelford Associates Inc., Westlake Village, CA
- Autry, Hall & Cook, LLP, Atlanta, GA
- Digital Wish, Milton, DE
- BluIP, Inc., Las Vegas, NV
- BT Americas, United Kingdom
- Educational Professional Services, Pine Grove, LA
- Epic Communications, Solon, OH

- E-Rate Central, Westbury, NY
- E-Rate Online LLC, Orange, CT
- Espy Services, Inc., Bedford, IN
- CRW Consulting, Tulsa, OK
- E-rate Services, LLC, Sanford, NC
- Healthcare Funding Connection, Prospect, KY
- Educational Professional Services, Pine Grove, LA
- Infinity Communications & Consulting Inc., Bakersfield, CA
- E-Rate and Educational Services, LLC, Rapid City, SD
- Janice Meyers Educational Consulting, LLC, Mount Pleasant, SC
- Kellogg & Sovereign Consulting, San Antonio, TX
- EveryLibrary Institute NFP, Berwyn, IL
- Funds For Learning, Edmond, OK
- HealthConnect Networks, Bangor, ME
- Heartland Consulting, Mitchell, SD
- Heberly & Associates, Havre, MT
- Los Angeles County Office of Education, Los Angeles, CA
- Lucky Thirteen Design and Consulting, LLC, Berkeley, CA
- Matthey Consulting LLC, Bethesda, MD
- SpectraCorp Technologies Group Inc., Dallas, TX
- State Educational Technology Directors Association (SETDA), Glen Burnie, MD
- TCA, Inc. - Telcom Consulting Associates, Colorado Springs, CO
- Telcom Insurance Group, Wichita, KS
- Telconnections, Inc., Little Rock, AR
- TelNet Worldwide, Clinton Township, MI
- Utah Broadband Center, Governor's Office of Economic Opportunity, Salt Lake City, Utah
- Van Hoet & Company, Chartered, Olathe, KS
- VST Services, LP, Trophy Club, TX
- Western New York Rural Area Health Education Center (WNY R-AHEC), Warsaw, NY