

ARMSTRONG®

September 28, 2023

Via E-mail to ConnectAmerica@fcc.gov

Wireline Competition Bureau
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

**Re: Enhanced A-CAM Election Letter
Armstrong Holdings, Inc., #130071**

To Whom It May Concern:

Armstrong Holdings, Inc. (Company) Provider ID 130071, hereby submits this letter to indicate that it will elect the Enhanced Alternative Connect America Model (Enhanced A-CAM) support in Study Area Codes and States:

<u>Company</u>	<u>SAC</u>	<u>State</u>
Armstrong Telephone Company-MD	180216	MD
Armstrong Telephone Company-NY	150071	NY
Armstrong Telephone Company-PA	170189	PA
Armstrong Telephone Company-North	170195	PA
Armstrong Telephone Company-WV	200256	WV
Armstrong Telephone Company-ND	200267	WV

The Federal Communications Commission's Wireline Competition Bureau (Bureau) released a Public Notice instructing rate-of-return carriers electing EA-CAM to file a letter via email by September 29, 2023 confirming that it "elects the Enhanced A-CAM support amount as specified in Report 2.1 released on September 21, 2023, and commits to satisfy the specific service obligations associated with that amount of model support, including both the deployment of 100/20 Mbps or faster service to all required locations and the maintenance of 100/20 Mbps or faster service to currently served locations."¹ Subsequent to the release of the Enhanced A-CAM Election PN, the Bureau released revised versions of the offers in updated reports entitled "Enhanced A-CAM – A-CAM 2.6.0 – Report Version 2, Report/Tables 2.1 through 2.5."²

¹ *Wireline Competition Bureau Announces Enhanced Alternative Connect America Cost Model Support Amounts Offered to Rate-of-Return Carriers to Expand Rural Broadband*, WC Docket No. 10-90 (rel. Aug. 30, 2023), DA 23-779 (Enhanced A-CAM Election PN). The Enhanced A-CAM Election PN also requires electing carriers to identify in their election letters the technology or technologies they plan to use to meet their Enhanced A-CAM deployment obligations and those with "mixed support" should explicitly acknowledge that the election applies to both their A-CAM and CAF BLS study areas.

² *Wireline Competition Bureau Announces Corrected Enhanced Alternative Connect America Cost Model Support Offers for 82 Companies*, WC Docket 10-90 (rel. Sept. 21, 2023) DA 23-835.

The Company hereby commits to satisfying the specific service obligations associated with that amount of model support that it is eligible to receive in Maryland, New York, Pennsylvania, and West Virginia, including both the deployment of 100/20 Mbps or faster service to all required locations and the maintenance of 100/20 Mbps or faster service to currently served locations. The location totals and specific service obligations for each type of location are specified in the Excel workbook entitled “Enhanced A-CAM – A-CAM 2.6.0 – Report Version 2, Report/Tables 2.1 through 2.5.” The amounts the Company intends to elect are identified in Report/Table 2.1. For the Legacy companies, the amounts the Company intends to elect are identified by year in Report/Table 2.3. According to the Enhanced A-CAM Order, the Bureau will determine the exact set of locations that must be served “based on the Fabric, the Broadband Data Collection, and further deduplication of enforceable commitments” and “may make adjustments, by no later than the end of 2025.”³ Accordingly, the commitment made above encompasses the exact set of locations and any adjustment in support that will ultimately be determined by the Bureau pursuant to this “true-up” process.

The Company hereby notifies the Bureau that it intends to use the following technology to meet its Enhanced A-CAM deployment obligations:

<u>Company</u>	<u>SAC</u>	<u>Technology</u>
Armstrong Telephone Company-MD	180216	hybrid fiber to the home/coax
Armstrong Telephone Company-NY	150071	fiber to the home
Armstrong Telephone Company-PA	170189	fiber to the home
Armstrong Telephone Company-North	170195	fiber to the home
Armstrong Telephone Company-WV	200256	hybrid fiber to the home/coax
Armstrong Telephone Company-ND	200267	fiber to the home

The election applies to the companies noted above that are currently receiving support through Connect American Fund-Broadband Loop Support (CAF-BLS) as well as those currently receiving support through Alternative Connect America Model (A-CAM).

Please contact the undersigned with any questions on the Company’s Enhanced A-CAM election described herein.



Jeffrey A. Ross
President

³ Connect America Fund; ETC Annual Reports and Certifications; Telecommunications Carriers Eligible to Receive Universal Service Support; Connect America fund – Alaska Plan; Expanding Broadband Service Through the ACAM Program, WC Docket Nos. 10-90, 14-58, 09-197, and 16-271; RM-1168, Report and Order, Notice of Proposed Rulemaking, and Notice of Inquiry, FCC 23-60 at para. 34 (July 24, 2023) (Enhanced A-CAM Order).