Telecommunications Industry Association 1310 North Courthouse Road, Suite 890

Arlington, VA 22201 | www.tiaonline.org



December 2, 2020

BY ELECTRONIC FILING

Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: Ex Parte Meeting, Protecting Against National Security Threats to the Communications Supply Chain Through FCC Programs, WC Docket No. 18-89.

Dear Ms. Dortch:

On December 1, 2020, Melissa Newman and Colin Andrews of the Telecommunications Industry Association ("TIA") met with Austin Bonner of Commissioner Stark's office to discuss the above-captioned proceeding.

During the meeting, TIA commended the Commission's efforts to improve national security through the adoption of a rule that bars recipients of universal service funds to utilize any equipment or service from suppliers that pose a national security risk. TIA has long advocated against policies that create a preference for certain Information Communication Technologies ("ICT") where two technologies otherwise serve customers equally. We believe this approach has, for decades, resulted in and will best ensure continuation of the development and deployment of high quality next-generation telecommunications networks and services. TIA urged the Commission to follow this time-honored technology neutral approach in determining what equipment and services can be used by U.S. providers to replace at-risk equipment as any preferences would be anti-competitive and could skew the deployment of technologies in some areas that may be better suited with a different technology.

TIA appreciated that the recently released draft item in the above captioned proceeding was technology neutral in practice, but raised concerns TIA has with some of the language in the draft that could be read as promoting certain solutions over others. Existing telecommunications equipment manufacturers and services providers have decades of experience building trustworthy, resilient, and secure telecommunications networks throughout the country. These manufacturers and providers are continually innovating and play an important and vital role in the ongoing deployment of trusted and reliable nationwide 5G networks. Accordingly, the Commission should continue to leverage these existing, time-tested technologies for securing networks alongside any new and emerging solutions. Finally, TIA urged the Commission to treat new technologies and existing technologies equally in terms of funding opportunities.



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Pursuant to Section 1.1206 of the Commission's rules, this letter is being filed in ECFS. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s Melissa Newman

Melissa Newman Vice President, Government Affairs Telecommunications Industry Association

CC: Austin Bonner