



November 13, 2017

The Honorable Greg Walden
Chairman
Committee on Energy and Commerce
United States House of Representatives

The Honorable Frank Pallone
Ranking Member
Committee on Energy and Commerce
United States House of Representatives

Dear Chairman Walden, Ranking Member Pallone and Distinguished Committee Members:

The undersigned associations write to urge you to support the inclusion of H.R. 3787, the Small Entity Regulatory Relief Opportunity (SERRO) Act, in the Federal Communications Commission (FCC) Reauthorization legislation currently being considered by the Energy and Commerce Committee. SERRO is a bi-partisan bill introduced by Committee members Rep. Bob Latta and Rep. Kurt Schrader to provide regulatory relief to small companies that are subject to the FCC's jurisdiction.

As Mr. Latta stated upon the introduction of SERRO, "small businesses are the engines of our economy – creating two out of three new jobs" but also are "the most susceptible to burdensome regulations that harm their ability to grow, expand and hire new employees." This is especially true of small entities operating in the telecommunications sector, where subjecting all companies, regardless of size, to the same regulatory burdens can and does end up imposing unnecessary costs on small entities and their customers.

In the past, Congress and the FCC have addressed small communications providers' need for regulatory relief through case-by-case exemptions or by delaying the implementation of new regulatory obligations to small entities. SERRO would establish a more certain and administratively efficient approach to granting small entities with such regulatory relief.

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First, SERRO directs the FCC to establish streamlined, cost-saving procedures for small entities (or their representatives) to obtain relief through case-by-case waivers of specific regulatory obligations.

Second, SERRO strikes a balance by deferring the imposition of new regulatory burdens on small entities for one year after the regulations first apply to larger entities (except in certain instances where Congress bars such deferral or the FCC determines that the regulation is principally intended to serve the public interest by protecting public safety or preventing waste, fraud or abuse) while allowing Congress or the Commission to ensure that new policies that allow small entities to compete more effectively are not delayed.

Finally, as a way to reduce the need for case-by-case waiver applications, SERRO requires the FCC to conduct a proceeding (with participation by any interested stakeholders) to review all of its existing regulations every three years in order to determine whether there is good cause to modify any specific obligations imposed by the FCC on small entities.

As associations representing more than a thousand small entities that provide vital communications services to more than ten million Americans in total, we very much look forward to working with you and the other members of the Committee on both sides of the aisle to achieve the enactment of this important piece of legislation. As a critical step towards that goal, we respectfully request your support for the inclusion of SERRO in the pending FCC reauthorization legislation.

Sincerely,



Matthew M. Polka
President & CEO
American Cable Association



Steven K. Berry
President & CEO
Competitive Carriers Association



Heather Burnett Gold
President & CEO
Fiber Broadband Association



Chip Pickering
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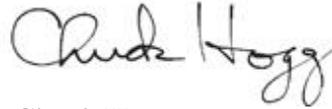
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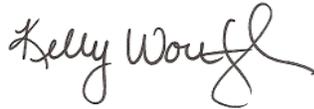
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