

**BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION**

**IN THE MATTER OF THE COMMISSION’S 2025 )  
REPORT TO THE LEGISLATURE PER THE RURAL )  
TELECOMMUNICATIONS ACT OF NEW MEXICO, )  
NMSA 1978 SECTION 63-9H-6(S) )**

**Docket No. 24-00262-UT**

**COMMENTS OF CTIA – THE WIRELESS ASSOCIATION<sup>®</sup>**

CTIA – The Wireless Association<sup>®</sup> (“CTIA”)<sup>1</sup> submits these comments in response to the New Mexico Public Regulation Commission’s (“Commission’s”) Initial Order Opening The Docket (“Initial Order”) entered on October 17, 2024 in the above-referenced docket.

**I. INTRODUCTION**

The State of New Mexico has long recognized the need to connect all New Mexicans. One of the primary tools used to pursue the goal of universal service throughout New Mexico is the State Rural Universal Service Fund (“SRUSF”), established by the Rural Telecommunications Act of New Mexico (“RTA”). Through the SRUSF, the RTA historically provided support for incumbent voice providers operating in rural areas parts of New Mexico.

Through a series of legislative changes in the recent past, the RTA now authorizes funding of broadband deployment through the SRUSF and does so through a regressive tax on telecommunications “connections” (commonly called a “connections-based surcharge”) that disproportionately is borne by wireless consumers. Due to the fact that nearly 85% of the

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<sup>1</sup> CTIA – The Wireless Association (“CTIA”) ([www.ctia.org](http://www.ctia.org)) represents the U.S. wireless communications industry and the companies throughout the mobile ecosystem that enable Americans to lead a 21<sup>st</sup> century connected life. The association’s members include wireless carriers, device manufacturers, and suppliers as well as app and content companies. CTIA vigorously advocates at all levels of government for policies that foster continued wireless innovation and investment. CTIA represents a broad diversity of stakeholders, and the specific positions outlined in these comments may not reflect the views of all individual members. The association also coordinates the industry’s voluntary best practices, hosts educational events that promote the wireless industry and co-produces the industry’s leading wireless tradeshow. CTIA was founded in 1984 and is based in Washington, D.C.

connections in New Mexico are wireless,<sup>2</sup> the bulk of the SRUSF funding burden is carried by wireless consumers.

The RTA requires the Commission to provide a more comprehensive annual report in 2025 than the Commission has been required to submit in other years. Unlike the typical annual report, the 2025 report must address specific issues highlighted in the RTA.<sup>3</sup> In response to this mandate, the Commission issued its Initial Order in the instant case. In Attachment A to the Initial Order, the Commission seeks responses to eight questions in order to help it prepare its annual report.<sup>4</sup>

As explained in greater detail below, CTIA continues to support funding broadband deployment through a SRUSF broadband program administered by the Commission in a technologically and competitively neutral manner, as the Commission has done since the SRUSF was amended to include the broadband program. However, CTIA suggests lowering the overall fund size by lowering the SRUSF cap to reflect the removal of discontinued subsidies and capping it at no more than \$10 million. CTIA's responses to the Commission's specific questions are provided below.

## II. CTIA'S RESPONSES TO QUESTIONS POSED BY PRC

- 1. The Commission has experienced a decrease in the amount of funding requested for broadband program support each year since 2022. Please explain your view as to why this decrease has occurred and provide supporting data. Explain whether you believe this decrease will continue.**

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<sup>2</sup> CTIA bases this 85% estimate on calculations made using wireless service, local exchange service, and voice over internet protocol service subscription data from the Federal Communications Commission's ("FCC's") Voice Telephone Services Report: Status as December 31, 2023, Industry Analysis Division, Office of Economics and Analytics, November 2024, available at <https://docs.fcc.gov/public/attachments/DOC-407308A1.pdf>.

<sup>3</sup> See NMSA 1978 § 63-9H-6(S).

<sup>4</sup> Initial Order, In the Matter of the Commission's 2025 Report to the Legislature per the Rural Telecommunications Act of New Mexico, NMSA 1978, Section 63-9H-6(S) (October 17, 2024). CTIA notes that the numbering in Attachment A mistakenly lists two distinct questions as the second question, so while the listed questions in Attachment A end at question seven, there are in fact eight questions.

**Alternatively, provide your reasoning if you expected the amount of funding requested to increase or remain the same. Provide supporting data.**

In the recent past, there has been abundant federal funding earmarked for broadband deployment in New Mexico. According to Connect New Mexico, the amount of federal funding available for broadband deployment totals well over a billion dollars.<sup>5</sup> By far, the largest single source of such funding is the Broadband Equity, Access, and Deployment (“BEAD”) Program,<sup>6</sup> which allocated \$675 million for projects expected to be completed within four years of funding being awarded by New Mexico to a subgrantee.<sup>7</sup> While the exact BEAD deployment timeline remains uncertain, it is reasonable to assume that most projects in New Mexico will be completed by the end of 2029 or sometime in 2030.<sup>8</sup>

Among the requirements of the BEAD program is for New Mexico to identify and list all existing sources of broadband funding and “minimize duplication of efforts or funding.”<sup>9</sup> In a similar vein, SRUSF projects cannot receive funding if they receive funding from either BEAD or American Recovery Plan Act (“ARPA”) programs.<sup>10</sup> Accordingly, SRUSF applicants must take great care to identify small, easily isolated projects that will not be rendered ineligible for SRUSF funding by receipt of BEAD or ARPA funding.

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<sup>5</sup> See Connect New Mexico, “New Mexico Funding Awards,” <https://connect.nm.gov/funding-awards.html>.

<sup>6</sup> See Infrastructure Investment and Jobs Act, Pub. L. No. 117-58 (2021) (“IIJA”) at § 60102(J).

<sup>7</sup> See U.S. Department of Commerce, National Telecommunications and Information Administration (“NTIA”), Notice of Funding Opportunity (May 12, 2022) (“BEAD NOFO”), available at <https://broadbandusa.ntia.gov/sites/default/files/2022-05/BEAD%20NOFO.pdf>, at page 43; § IV.B.7.b.2.i (“Secondary Criteria” of “Speed to Deployment”).

<sup>8</sup> New Mexico has an approved Initial Proposal but has not yet completed its challenge process or any subsequent steps. See Internet for All, “BEAD Progress Dashboard,” <https://www.internetforall.gov/bead-progress-dashboard>. Based on this progress, it is reasonable to assume that payment of funds to subgrantees will not occur any earlier – and likely far later – than the beginning of 2025, which aligns with projects being completed in 2029-2030.

<sup>9</sup> NTIA “Internet for All: Broadband Equity Access, and Deployment (BEAD) Program, Initial Proposal Guidance” (July 2023), available at [https://broadbandusa.ntia.doc.gov/sites/default/files/2023-07/BEAD\\_Initial\\_Proposal\\_Guidance\\_Volumes\\_I\\_II.pdf](https://broadbandusa.ntia.doc.gov/sites/default/files/2023-07/BEAD_Initial_Proposal_Guidance_Volumes_I_II.pdf) at page 11.

<sup>10</sup> 17.11.10.31.A NMAC (“Projects receiving any source of third-party funding other than” from named sources that do not include either BEAD or ARPA “will not be eligible” for SRUSF funding.)

Because applicants to either the BEAD or SRUSF programs must avoid proposing a project for which there will be overlapping funding, and attributable to the far greater funding available through the BEAD program, it is reasonable to assume that entities interested in broadband funding will focus on potential BEAD projects that can be far larger than the scope of any project funded through the comparatively modest in size SRUSF broadband fund. CTIA concludes that the reduction in SRUSF funding requests highlighted by the Commission is a circumstance that is likely to persist for several years as the BEAD and ARPA processes continue.

As explained in greater detail in response to question four *infra*, the BEAD program targets for coverage those areas in New Mexico that are eligible for SRUSF funding. The BEAD program's level of success will directly impact the volume of future SRUSF applications. Unfortunately for the Commission, the earliest hint of the extent to which BEAD funding will remove SRUSF eligible areas will be when projects selected by New Mexico are approved by the National Telecommunications and Information Administration ("NTIA"). While that milestone will be noteworthy, the degree to which such projects eliminate SRUSF eligible areas will remain unknown until years after such NTIA approval is granted.

**2. Per statute, the access reduction support ("ARS") payments from the state rural universal service fund ("SRUSF") made to eligible incumbent local exchange carriers will end after December 31, 2026. Should the access reduction support funds be repurposed for the Commission's broadband support program?**

i. **If not, explain why not.**

ii. **If yes,**

**A. Explain how the repurposing would advance the policies of the Rural Telecommunications Act.**

**B. Assuming the current trend of decreasing broadband program funding requests continues, explain how repurposing the available funds would be justified.**

As currently worded, the RTA envisions a \$30 million SRUSF from which all funds not “expended pursuant to” purposes described in certain subsections “shall be dedicated to the broadband program.”<sup>11</sup> In essence, the RTA requires the Commission to maintain a \$30 million SRUSF, obligates some SRUSF funds to particular purposes or categories, and includes a provision requiring that funds not otherwise spent are to be repurposed to broadband.

For 2025, ARS subsidies are approximately \$16.4 million, the broadband program receives an allocation of \$8 million (plus overflow funding), and other programs and administrative expenses total approximately \$1.6 million.<sup>12</sup> Thus, all non-ARS obligations total approximately \$9.6 million. CTIA recommends reducing the SRUSF cap to reflect the removal of former ARS obligations, with the broadband fund capped at or below its current \$8 million allocation and the overall fund capped at \$10 million. This would provide funding for all non-ARS allocations based on the 2024 projection for the 2025 SRUSF.<sup>13</sup>

Wireless consumers disproportionately bear the weight of the regressive connections-based surcharge the Commission has adopted, but all telecommunications consumers pay the surcharge. If ARS payments are eliminated, New Mexico consumers will see a direct benefit in the form of a considerably lower surcharge level. ARS obligations constitute 63% of the current

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<sup>11</sup> See NMSA § 63-9H-6(O).

<sup>12</sup> See Order Adopting 2025 Fund Size and 2025 Per-Communication Connection Surcharge, In the Matter of the State Rural Universal Service Fund 2025 Per-Connection Charge and Fund Size Calculation, Case No. 24-00243-UT (November 14, 2024) at Exhibit A.

<sup>13</sup> *Id.*

SRUSF obligations, so consumer relief from eliminating ARS funding alone will be tangible and significant.<sup>14</sup>

Due to the anticipated diminished broadband funding demand discussed above, capping the broadband portion of the fund at or below the \$8 million RTA-designated level that has proven successful to the benefit of New Mexico under the Commission's technology neutral stewardship is appropriate. Such a change will allow the Commission to continue its work fulfilling the RTA's broadband deployment goals, making awards only to worthwhile projects that advance the public good, while recognizing that funding for such projects is paid directly by consumers and any burden on those consumers should be minimized.

3. **Recommend a methodology for determining broadband support levels that is consistent with the requirements of Subsection C of the state rural universal service fund statute and accounts, at a minimum, for broadband costs, potential revenues from deployed infrastructure and existing federal support mechanisms.**<sup>15</sup>

CTIA has no suggestions to offer in response to this question.

4. **Recommend the appropriate fund size the Commission should propose to the Legislature. Provide an explanation for that recommendation.**

The Commission should recommend reduction of the overall SRUSF cap. The Commission itself notes in the first question posed in the Initial Order that the SRUSF has experienced diminishing funding requests across the past two funding cycles.<sup>16</sup> As CTIA explained in response to that question, there are good reasons to believe that decreased funding requests will persist for at least the next several years. Furthermore, the Commission must

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<sup>14</sup> See *id.* at Exhibit A (showing a current ARS obligation of \$16.4 million and an overall SRUSF obligation of \$26 million).

<sup>15</sup> Starting with this question, CTIA's comments correct the numbering contained in Attachment A of the Initial Order, which lists two questions as questions 2.

<sup>16</sup> See Initial Order at Attachment A, Question 1.

grapple with the fact that the areas in which SRUSF funding may be applied are targeted for reduction, and perhaps elimination, through federal programs over the next several years. Therefore, increasing the size of the SRUSF at this time would not be advisable. As CTIA explained in response to question two *supra*, it recommends a \$10 million SRUSF cap, which is sufficient to cover all current non-ARS allocations. Aside from the reasons already provided above, CTIA recommends reducing the SRUSF's size due to the fact that areas appropriately targeted for SRUSF broadband deployment funding also are targeted for broadband deployment funding through the BEAD program, which the State of New Mexico is tasked with administering.

The BEAD program has a sequence of mandatory priorities that New Mexico must seek to achieve.<sup>17</sup> The highest priority is to fund deployment to all unserved areas in the state – areas with broadband speeds below 25/3 Mbps.<sup>18</sup> The second priority is to fund deployment to all underserved areas in the state – areas with broadband speeds below 100/20 Mbps.<sup>19</sup> If New Mexico meets these two deployment funding priorities under the BEAD program, all areas of New Mexico will have access to broadband service meeting the SRUSF definition. This is so because the Commission is tasked with funding broadband deployment to areas that fall within the BEAD primary deployment priority: areas without access to broadband that provides a speed of 25/3 Mbps.<sup>20</sup>

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<sup>17</sup> See BEAD NOFO at page 41; § IV.B.U.b.1 (“Complete Coverage of Unserved Locations and Underserved Locations, Followed by Prioritization of Eligible [Community Anchor Institutions]”).

<sup>18</sup> The IJA defines a location as unserved if it lacks access to a broadband service offering speeds of 25 Mbps for downloads, 3 Mbps for uploads, and low enough latency to support real time interactive applications. IJA at § 60102(a)(1)(A) (defining “Unserved Location”).

<sup>19</sup> IJA at § 60102(a)(1)(C) (defining “Underserved Location”). The third priority under BEAD, funding deployment to community anchor institutions, *see fn. 17 supra*, is not relevant to the instant discussion.

<sup>20</sup> 17.11.10.31.D(1)-(4) NMAC (in addition to the speed requirement, the service must be able to support voice grade telephony, access to 911 services, and low latency).

There is no reasonable justification for the Commission to recommend an increase to the size of the SRUSF at this time. Instead, the Commission should recommend capping broadband funding at or below its current \$8 million allocation, with a commensurate SRUSF cap set at \$10 million, so consumers can enjoy relief from the SRUSF surcharge burden they bear.

**5. Recommend the criteria for awarding funding the Commission should propose to the Legislature. Please explain whether the Commission should recommend removing the criteria that the fund be technologically neutral. Please elaborate on your reasoning.**

CTIA recommends no change to the current criteria. In particular, CTIA recommends no change to the criteria that the SRUSF be technologically neutral. The requirement that the SRUSF be administered in a technology neutral manner arises from the RTA itself. The RTA indicates that “[t]he fund shall be competitively and technologically neutral, equitable and nondiscriminatory in its collection and distribution of funds...”<sup>21</sup> The Commission has embedded this principle in its rules, which indicate that “[t]he commission will consider projects on a technology-neutral basis.”<sup>22</sup> The other support eligibility criteria governing the SRUSF are similarly technologically and competitively neutral. For a project to be eligible for support, the area to be served must be rural<sup>23</sup> and the project must support speeds of at least 25/3 Mbps, voice grade telephony service, access to emergency 911 services, and latency sufficiently low to support real-time, interactive applications.<sup>24</sup>

The Commission is to be commended for recognizing that it will take a mix of technologies to reach all customers in a state as large as New Mexico. CTIA urges the Commission to recommend maintaining the technologically and competitively neutral approach

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<sup>21</sup> NMSA § 63-9H-6(C).

<sup>22</sup> 17.11.10.31.D NMAC.

<sup>23</sup> 17.11.10.7.U NMAC.

<sup>24</sup> 17.11.10.31.D(1)-(4) NMAC.



embedded in the RTA and SRUSF, which has led to awards for wireless projects that have been constructed to the benefit of New Mexicans across the state.

**6. Explain the impact of the proposed changes on per-connection assessments.**

As noted *supra*, removal of the ARS funding obligation from the SRUSF would reduce the current SRUSF by at least 63% – a present and tangible benefit to consumers.

**7. Should the Commission recommend that all sellers of prepaid telecommunication services be required to collect state rural universal service fund assessments at the point of sale, as is done when collecting 911 emergency surcharges pursuant to Section 63-9D-5 NMSA 1978. Explain why or why not.**

Yes. The RTA requires that the SRUSF will be “competitively and technologically neutral, equitable and nondiscriminatory in its collection ... of funds,”<sup>25</sup> and that surcharges are “to be paid by the end-user customers.”<sup>26</sup> While postpaid wireless and wireline consumers pay the SRUSF surcharge directly via their monthly bills, collection of SRUSF surcharges from prepaid wireless customers on the same basis is not always feasible due to the general lack of a direct and ongoing billing relationship between prepaid wireless providers and their customers.

Prepaid cards are widely available from both online and brick-and-mortar third-party retailers, from convenience stores to big-box retailers, and many prepaid wireless customers purchase such cards from third-party retailers to replenish their accounts.<sup>27</sup> Relative to such purchases, these customers have no direct billing relationship with the prepaid wireless provider.

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<sup>25</sup> NMSA § 63-9H-6.C.

<sup>26</sup> NMSA § 63-9H-6.J (indicating that SRUSF surcharges are “... to be paid by the end-user customer” and “will be held to a minimum”).

<sup>27</sup> The Commission also should note that prepaid wireless providers’ national or regional footprints make it illogical to attempt to collect the SRUSF surcharge via prepaid cards. Doing so would represent a considerable and discriminatory hardship insofar as it would require New Mexico-specific cards and the Commission’s annual surcharge change would necessitate a massive recall of all cards distributed to physical sales channels in New Mexico; any card indicating the amount of the SRUSF surcharge would be rendered erroneous when the Commission annually adjusts the surcharge.

Prepaid wireless providers cannot collect surcharges from these customers in the same manner that other providers collect surcharges from their customers. While all non-prepaid wireless providers can reliably collect the SRUSF surcharges on a monthly basis by reflecting the surcharge separately from service charges on customers' monthly bills, prepaid wireless providers have a monthly SRUSF surcharge obligation, but no certainty that prepaid customers will make monthly purchases and associated payment. Additionally, while other providers can reflect the SRUSF surcharge separately from service charges, prepaid wireless providers cannot separate such charges when purchases are made through third-party sales channels. They must decide between charging higher overall rates, which is difficult in the highly competitive wireless market, or accepting lower profits by charging competitive rates. To the extent other providers need not face this "rock and a hard place" dilemma, prepaid wireless providers' SRUSF payment obligations place them at a competitive disadvantage, which is discriminatory.

The lack of point of sale collection continues to violate the RTA's requirement to collect SRUSF surcharges from customers on a competitively neutral basis. CTIA supports collection of SRUSF surcharges at the point of sale for prepaid purchases. Doing so will bring SRUSF collections from prepaid wireless customers into compliance with the RTA's competitively neutral requirements, and is the most equitable approach.

- 8. Identify any barriers experienced by the ETCs to the construction and maintenance of broadband infrastructure that undermine the efforts toward digital equity and digital inclusion in rural New Mexico. Suggest any recommendations that the Commission can make to the Legislature that may alleviate those barriers.**

CTIA has no suggestions to offer in response to this question.

### III. CONCLUSION

CTIA appreciates the opportunity to participate in the Commission's preparation of its 2025 report to the Legislature. The Commission's has commendably administered the SRUSF's broadband fund, but the influx of over a billion dollars of federal broadband deployment funding should be met by relief for New Mexico consumers who are taxed to fund the SRUSF. Accordingly, CTIA suggests that reducing the overall size of the SRUSF to \$10 million, as described herein, while maintaining the Commission's role administering the SRUSF's broadband fund in a technologically and competitively neutral manner strikes an appropriate balancing of the RTA's broadband deployment goal, the availability of abundant federal funding for broadband deployment, and relief for New Mexico consumers who are taxed to fund the SRUSF.

Respectfully submitted,

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NMSA 1978, SECTION 63-9H-6(S) )**

**CERTIFICATE OF SERVICE**

I CERTIFY that a true and correct copy of the foregoing *Initial Comments of CTIA* was emailed on this date to the parties listed below.

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 Excess Telecom, Inc.  
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MCI Communications Services  
MCImetro Access Transmission Services LLC  
McLeod USA Telecommunications Services  
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Mescalero Apache Telcom, Inc  
MetroPCS Texas LLC  
Metropolitan Telecommunication of NM  
Metropolitan Telephone Co., Inc.  
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Mosaic Networx LLC  
Motorola Solutions Connectivity, Inc. fka Vesta Solutions, Inc.  
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Nationwide Long Distance Svce  
Navajo Communications Company, Inc  
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NetForce PC, Inc.  
NetFortis Acquisition Co., Inc.  
Netwolves Network Services LLC  
Network Billing Systems, LLC  
Network Comms. Int'l Corp.  
Network Communications Int'l Corp.  
NetworkIP, LLC  
New Cingular Wireless PCS, LLC  
New Horizons Comms. Corp.  
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PVT Wireless Limited Partnership  
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Q Link Wireless  
Quantumshift Communications, Inc.  
Qwest Corporation dba CenturyLink QC  
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Travis Business Systems, Inc.  
Travis Sullivan  
Tri-State Generation and Transmission Association  
Troomi Wireless Inc.  
Troy Judd  
TruConnect Communications Inc.  
Truphone, Inc.  
TTI National, Inc.  
Tube Incorporated d/b/a Reach Mobile  
Tularosa Basin Telephone Company  
Tularosa Communications, Inc.  
TWC Digital Phone LLC  
TW Telecom of New Mexico LLC  
Unite Private Networks, LLC  
Unity Wireless, Inc.  
US Mobile LLC  
USA Digital Communications, Inc.  
USIPCommunications, LLC  
Utility Telecom Group, LLC  
UVNV, Inc.  
V. Barela  
Valley Telephone Cooperative, Inc  
Valor Telecommunications of Texas, LP  
ValuTel Communications, Inc.  
Velocity, A Managed Service Company, Inc.  
Verizon Select Services, Inc.  
Vero Broadband, LLC  
Verve Cloud, Inc.  
Vexus Fiber, LLC fka NTS Communications, Inc.  
ViaSat, Inc.  
Viirtue, Inc.  
Virgin Mobile USA, LLC  
Visible Service LLC  
Vive Communications, LLC  
Vodafone US Inc.  
Voiccom Telecom., LLC  
Voipia Networks, Inc.  
VoIPly, LLC  
VoIP Street, Inc. dba VoIP Innovations  
Volt Mobile Inc.  
Vonage Business Inc.  
Voyageur Security Inc. dba Access Technologies  
Voyant Communications, LLC  
Wade Nelson  
Walter Haase  
Warren Fischer  
Warren Thomas  
WaveNation, LLC  
Wayne Baxter  
WDT World Discount Telecommunications  
Wendy Harper

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West IP Communications  
West Telecom Services, LLC  
Western Interactive Networks  
Western New Mexico Telephone Company  
Wholesale Carrier Services, Inc.  
William Cabral  
Windstream New Edge, LLC fka EarthLink Business, LLC  
Wing Tel, Inc.  
Working Assets Funding Service  
XCast Labs  
Xchange Telecom LLC  
XO Communications Services, Inc.  
Yucca Telecommunications Systems(CLEC)  
Zayo Group, LLC  
Zefcom, LLC dba Affinity Cellular dba Club Cellular  
Zen Communications LLC  
Zianet  
Ztar Mobile Inc  
Zultys Inc.

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**DATED** this 5<sup>th</sup> day of December, 2024.

**VELARDE & YAR**

**/s/ Shawna Tillberg**  
**Shawna Tillberg, Paralegal**