

April 10, 2009

Broadband Technology Opportunities Program
U.S. Department of Commerce
Room 4812
1401 Constitution Avenue, NW
Washington, DC 20230

Re: Docket 090309298-9299-01

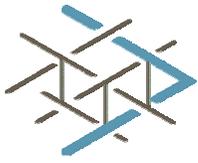
Please accept the following comments from the National Association of Regional Councils (NARC) to help define approaches and partners that may produce the maximum benefits and most uniform and timely implementation of projects funded by the American Recovery and Reinvestment Act of 2009 (ARRA) for the Broadband Technology Opportunities Program (BTOP).

The National Association of Regional Councils (NARC) is a 501(c)3 non-profit that represents multi-jurisdictional regional planning organizations serving local governments and their local elected officials to improve community planning, development and infrastructure issues. NARC members include Councils of Government (COGs), Metropolitan Planning Organizations (MPOs), Rural Planning Organizations (RPOs), Economic Development Districts (EDDs), and other regional planning organizations – urban and rural, large and small. Currently, there is an existing network of over 500 regional planning organizations throughout the country, which bring elected officials from cities, counties, towns, and townships together to address and develop all of the issues impacting communities.

Telecommunications is key to propelling communities through this economic recession and positioning them to be more competitive in the global knowledge economy by attracting and retaining new and start-up businesses, increasing the level of business and economic development, offering additional job opportunities, and improving the quality of life. Telecommunications advantages also create, enhance, and support better access to workforce, customers and markets. However, in many regions and communities across the United States, high-performing broadband technologies are not yet available. Affordable and sufficient telecommunications access must be available to all American communities and regions – large and small, urban and rural – to ensure effective local government services, an attractive workforce, and competitive communities.

The National Association of Regional Councils (NARC) and its members offers assistance to the National Telecommunications and Information Administration (NTIA) and Rural Utility Services (RUS) for the development of broadband telecommunications infrastructure programs for local governments and regions to better comprehend the issues and opportunities associated with federal broadband programs. With its over 40 years of experience, NARC and its membership are an ideal vehicle for assisting the NTIA and RUS, local governments and regional planning organizations in educating and partnering on opportunities associated with the broadband ARRA programs, particularly in building relationships with the private sector for extending broadband, creating linkages between served and unserved localities and increasing overall competitiveness.

In order to accomplish federal broadband objectives and given the importance of ARRA Section 6001(b)(3), (4) and (5) in relevance to community anchor institutions, the NTIA and RUS **should consider regional planning organizations and their member local governments key partners in helping define aggregate demand, optimizing broadband infrastructure and maximizing both short term and long term benefits of ARRA funding.** Furthermore, regional planning organizations should be considered primary applicants, as their work addresses more than one community purpose. NARC recommends that NTIA and RUS award higher priority to proposals that incorporate regional goals and multiple objectives in the areas



of smart grids, health information technology, education, and transportation infrastructure, satisfying the broadest set of community needs.

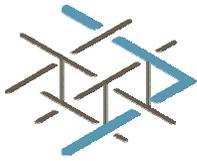
There are many existing federal, state, local and regional programs that have led to successful projects throughout the country. In particular, the NTIA BTOP has fostered a necessary public discussion as to how and who should direct investments in our telecommunications infrastructure. The ARRA has provided an additional focus on the importance of critical broadband infrastructure programs as it relates to enhancing jobs, education and health care. To this end, it is fundamental that elected officials, regional planners and community leaders become more intimately involved and gain a greater detailed understanding of information and communications technologies, analyses of aggregate community needs, the methods necessary to develop effective telecommunications infrastructure programs, and the economic benefits of telecommunications infrastructure investments. It is predominately through their involvement that these broadband ARRA investment dollars may be used to create more competitive and sustainable communities.

Generally speaking, infrastructure dollars are best utilized on the regional level through consensus building and planning efforts of local governments working collaboratively across multiple jurisdictions to meet the needs of communities, business and local, regional and national economies. Regional planning organizations are today's "boots on the ground" planners and implementers of tomorrow's regional infrastructure, guiding strategic investments within a regional vision. For these reasons, regional planning organizations are the perfect conduit for initiating and guiding broadband infrastructure within communities.

NARC, through participation from local elected officials and regional planning organization members, is uniquely qualified to assist the federal government in advancing five fundamental elements of ARRA's broadband initiatives:

1. Developing a set of processes to map current broadband capabilities in America's communities;
2. Assessing the geographic and socio-economic areas that are unserved and underserved;
3. Establishing a framework to assess the aggregate needs of community anchor institutions including education, health care, libraries, skills training, job access and public safety agencies;
4. Creating methodologies to measure and monitor performance of BTOP investments in compliance with the requirements of ARRA; and,
5. Identifying regional planning organizations that can implement innovative broadband projects that stimulate economic growth and job creation.

There are already some success stories of regional planning organizations as key partners in implementing broadband technologies to underserved or unserved areas. The Green River Area Development District (GRADD), a NARC member, is a regional planning agency serving seven western Kentucky counties, encompassing a region size larger than the state of Delaware, but with just one quarter of the population (approx. 212,000). Like most rural areas in America, opportunities for economic development in the district are limited. Communities within GRADD struggle to attract and retain industry because the infrastructure cannot compete with that of larger metropolitan areas. However, it has been said that the Internet is our era's great equalizer, allowing small, geographically isolated communities in the United States to compete for global industry. The same technology that allows many companies to locate their facilities outside of major metropolises also provides educational and entrepreneurial opportunities for rural residents. It is with this principle in mind that ConnectGRADD, Inc. was formed in 2006. ConnectGRADD allows rural residents to have unprecedented opportunities for education, self-employment and entertainment. Prior to the inception of ConnectGRADD, the majority of residents in GRADD's two largest cities, Owensboro (pop. 55,000) and Henderson (pop. 27,000), had affordable, highspeed



Internet access through private providers. However, none of the other cities in the district have more than 4,000 residents. Rural households subscribing to DSL or cable Internet services paid on average more than \$60 per month. ConnectGRADD aimed to offer comparable service for under \$30 per month to a minimum of 93 percent of residents in the seven-county area by the end of 2007.

A public-private partnership, ConnectGRADD was a major undertaking included multiple jurisdictions and involved a series of public meetings and educational opportunities for local elected officials to discuss with constituents the desirability – and necessity – of broadband access to their community’s viability. Additionally, GRADD, through their local elected policy board, worked closely with Kentucky state legislators and private business to secure funding for the project’s estimated \$2.3 million price tag. The ConnectGRADD, Inc. partnership strives to promote public awareness about this groundbreaking project. In an effort to keep citizens informed of progress, a website (www.connectgradd.net) was developed to provide citizens with frequent updates of specific developments in their county. A toll-free telephone number (1-877-GRADD-411) also was established to allow customers to sign up for Internet service.

In addition to impacting residential subscribers, ConnectGRADD will enhance Internet availability to allow local governments to improve their efficiency. Seven county fiscal courts and 27 cities will be able to offer e-government services such as online registration and bill payment. Countless other agencies will benefit as well, from health care providers utilizing tele-health technologies to educational institutions expanding their long-distance course offerings. ConnectGRADD will also encourage rural entrepreneurship to help local citizens start and grow small businesses.

NARC believes the successes for regional planning organizations like GRADD are only in the beginning stages and offer endless opportunities for broadband investment to significantly benefit the local, regional and national economies. By educating and hosting public-private roundtable events through the leadership of regional planning organizations, regions and communities will be better prepared to leverage these new opportunities. NARC strongly recommends NTIA and RUS partner with regional planning organizations like GRADD as implementers of broadband ARRA investments. These organizations have the experience in major infrastructure development, planning and implementation and they are able to bridge the diverse interests of the public and private sectors as well as those of the urban cores and rural communities in a fair, impartial and equitable manner. NARC further recommends that broadband ARRA grant funding include significant public sector involvement and that priority consideration be given to organizations that directly represent aggregate community interests.

We thank the NTIA and RUS for allowing public comment on this important issue and great opportunity for American economic growth. NARC and its members remain committed to improving our nation’s regions and communities, and offer our assistance. Please do not hesitate to me with any questions at fred@NARC.org or 202.986.1032.

Respectfully submitted,

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National Association of Regional Councils