



**MINNESOTA**  
DEPARTMENT OF  
**COMMERCE**

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April 13, 2009

Ms. Anna Gomez  
Deputy Assistant Secretary  
National Telecommunications  
and Information Administration  
US Department of Commerce  
1401 Constitution Avenue NW  
Room 4701  
Washington, DC 20230

Mr. James R. Newby  
Acting Administrator  
Rural Utilities Service  
US Department of Agriculture  
1400 Independence Avenue SW  
Room 5801-S, Stop 3201  
Washington, DC 20250

Mr. Michael Copps  
Acting Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Dear Deputy Assistant Secretary Gomez, Acting Chairman Copps, and Acting Administrator Newby:

When the State of Minnesota began its creation of a statewide broadband inventory map last year, pursuant to the state's standard operating procedure, we issued a request for proposals. Through this competitive bidding process, Connected Nation, Inc. was ultimately selected as the most qualified organization to produce and maintain a broadband map for the State of Minnesota.

In February of this year, Connected Nation provided to the State web-based maps of broadband availability in Minnesota, displaying broadband service in a searchable and verifiable format, down to the household level.

Minnesota is pleased with the work of Connect Minnesota, the state-based non-profit organization established by Connected Nation to manage our broadband mapping program. Despite assertions to the contrary, Connected Nation and Connect Minnesota have provided to the State everything requested or required, per the state contract. Specifically, Connect Minnesota rapidly implemented a program that has produced a map of Minnesota broadband availability, down to the street and individual household level. The map represents the service offerings of 104 broadband providers to date who have voluntarily agreed to participate in this mapping project. Consumers, government officials, local leaders, and potential broadband providers can use this interactive web-based map to understand precisely where broadband exists by type of platform, where unserved neighborhoods exist, and what those neighborhoods look like – how rural, the topography, the household density, and other key factors impacting the broadband market. As specified in the contract, Connect Minnesota continues to work on the ground with all broadband providers to update and refine this household level database of broadband availability, speeds, and demographics.

As a result, the State of Minnesota now has an invaluable set of tools for identifying unserved and underserved households in our state, understanding why households are still unserved, and

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developing specific policies to promote expansion of the broadband market to ensure all Minnesota residents have access to broadband.

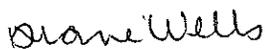
It appears there are concerns by some parties as to whether the Minnesota broadband map is verifiable. The State of Minnesota has taken a great deal of caution and care to ensure that this map is not only "verifiable," but is indeed verified on a continuing basis. This was an important factor in our evaluation of responses to our request for mapping services.

Because the raw network information that is used to create and update the map is too vast to be directly verifiable, we have worked with Connected Nation to develop a web-based mapping portal whereby the actual broadband availability data (which *are* verifiable) are publicly transparent for each household. Every Minnesota resident can check the map, or work over the phone with Connect Minnesota to check the map, for a listing of broadband providers serving each Minnesota address. Any inaccuracies are corrected immediately, in real time. In addition, Connected Nation engineers conduct extensive field tests, and the results of those tests are documented and compared against provider data to ensure accuracy.

The State selected Connected Nation as a result of the company's innovative model that works on behalf of the State to develop high quality and verifiable products. Further, the State of Minnesota decided that Connected Nation's approach to mapping, based on voluntary collaboration with the provider community, is the most expedient and effective way to produce this important policy tool. Now having this tool in hand to inform our public policy, we are confident we made the correct choice.

Connected Nation and Connect Minnesota have been excellent partners for Minnesota. As you develop a plan for mapping broadband availability across the United States, we invite and encourage you to look closely at Minnesota's broadband mapping process. We believe you will find an excellent model for mapping broadband availability in such a way that is transparent, verifiable, continuously updated, and perhaps most importantly, practical and valuable for identifying those unserved and underserved areas of Minnesota.

Respectfully,



DIANE WELLS  
Manager, Telecommunications Division  
Minnesota Department of Commerce

DW/cw

c: Members of the House Committee on Energy & Commerce Subcommittee on  
Communications, Technology, and the Internet