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GEORGE MASON UNIVERSITY

13 April 2009

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

RE: Docket Number: 090309298-9299-01

The Mercatus Center at George Mason University is submitting the following recommendations in response to the National Telecommunications and Information Administration's (NTIA) request for public comments regarding their Broadband Technology Opportunities Program (BTOP), under Section 6001 of the American Recovery and Reinvestment Act of 2009 (ARRA). We have also attached a study done by Mercatus Center Senior Research Fellow Jerry Ellig addressing municipality engagement in broadband service, published by Reason Foundation: "A Dynamic Perspective on Government Broadband Initiatives."

The Mercatus Center at George Mason University is a 501(C)(4) non-profit research, education, and outreach organization that works with scholars, policy experts, and government officials to connect academic learning and real world practice. When developing an approach to BTOP, we recommend the following:

**Develop clear goals for BTOP.** Spending programs often fail to be effective because of the simple step of creating clear goals. Without a measurable objective, BTOP contracts are more susceptible to political influence and muddled management. At the same time, clear goals provide a measurement of success or failure. By the NTIA choosing to fully articulate their intentions with BTOP, they take accountability for the outcomes of the program.

**Rationally define unserved and underserved communities.** With many interest groups wrestling for more favorable definitions of unserved and underserved communities, the NTIA should provide a clear definition of these terms. We suggest that the NTIA define unserved communities as communities that cannot purchase broadband service, and define underserved communities as communities that have the opportunity to purchase broadband service at higher prices than nearby communities.

**Map the country for broadband accessibility.** Most of the country has yet to be mapped for broadband accessibility. Having a picture of where all unserved and underserved communities exist will be very helpful in pinpointing the most in need communities.

**Focus on unserved communities.** Unserved communities are in the most unfavorable position for broadband access. And with the dynamism of the broadband industry, underserved communities today may not be underserved communities tomorrow. Funding projects in underserved communities may distort the highly competitive forces in these markets.

We hope you find this comment useful. We look forward to assisting the NTIA through making the best use of BTOP resources so please do not hesitate to contact us with any questions or requests.

Sincerely,

A handwritten signature in black ink, appearing to read "Rob Raffety". The signature is stylized with a large initial "R" and a long, sweeping underline.

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