



April 13, 2009

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

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

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

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

A decade ago, Kentucky – like many other states – was losing jobs and its people were suffering in the wake of the burst tech bubble. Our state had a plan for recovery through technology-based economic development, but no way to implement the plan without the proper broadband infrastructure. In response, Democrat Governor Paul Patton and later Republican Governor Ernie Fletcher called together members of the public and private sectors to work collaboratively and leverage resources in order to assess the extent of the problem, figure out where to target resources, and develop recommendations for connecting Kentucky.



ConnectKentucky: Accelerating Technology in the Commonwealth!

311 West Main Street • Frankfort, KY 40601 • Office: 866-923-7501 • Fax: 502-352-2872

WWW.CONNECTKENTUCKY.ORG

This public-private partnership was named ConnectKentucky. A leader before its time, this collaboration of state and local officials, economic development organizations, consumer advocacy groups, and private sector companies worked through a non-profit organization to develop a practical plan for building the supply of broadband by driving demand for broadband. The results for the state of Kentucky over the last five years have been tremendous:

- Broadband availability has increased from 60% to 95% of Kentucky homes
- Private telecommunications investment in Kentucky has topped \$900 million
- Kentucky IT jobs have grown at a rate of 3.1% over the last four years compared to national average declines of -4.2%.¹

Today, America's broadband challenges are similar to what Kentucky faced a decade ago. While Kentucky is still working to serve the final 5% of our most rural and hardest-to-reach unserved areas, the state has come a long way in filling the broadband gaps and establishing a statewide network that serves as the basis for Kentucky's first-rate educational, healthcare, and economic development applications. And today, although Kentucky's general economy is suffering with the rest of the nation, the state's IT job sector is still growing strong in the face of continued national declines.

We appreciate that S.1492, the Broadband Data Improvement Act of 2008, was modeled after ConnectKentucky. We applaud Congress for its vision and recognition that public-private partnerships – now working effectively in many states – have proven themselves as the effective means for not only mapping broadband availability, but simultaneously driving the use of broadband, improving the technology literacy of our residents, and ultimately stimulating our economy and creating jobs.

Yet, if public-private partnerships are to be effective, there are a number of critical details that must be included as our nation forges ahead to expand broadband for all Americans:

1. **Resources from both public and private sectors must be leveraged.** When ConnectKentucky was established, Governor Patton called for the private sector to contribute cash and in-kind resources to support the partnership. Ensuring that the private sector has some “skin in the game” is a critical element for success with sustainable broadband expansion initiatives.
2. **Proprietary and competitive data must be protected.** A broadband map is essential in any broadband policy. When Kentucky developed the first comprehensive broadband availability map in the nation back in 2005 – the

¹ Source: United States Bureau of Labor Statistics (www.bls.gov); percent change in information sector employment from January 2005 through December 2008

mapping model that has been used in many other states that are now successfully maintaining broadband inventory maps – we understood that there must be a balance to ensure that policymakers and consumers could get access to the information they need without inadvertently hindering broadband investment. The danger in regulating data collection or requiring submission of any and all data from providers is that it ultimately harms the very thing we are trying to accomplish – broadband investment. If competitive data is revealed, or just as importantly, if proprietary/competitive data is handed over to state or federal government, many providers will be unwilling to participate in the program, and the entire concept of a public-private partnership for broadband mapping will be lost. We are then forced to regulate data collection, which at best can deliver deployment data by some predetermined geographic unit, which results in useless broadband maps that are grossly overstated and not updated often enough to be useful tools for policy prescription at a state and local level.

In our experience working with over 80 providers in Kentucky,² many providers, particularly but not exclusively the small local providers and entrepreneurs, simply do not have deployment data required to populate a street-level map. Hence, any legislative or regulatory mandate to report such data would result in prohibitive burden for the providers, rendering the plan unviable. Perhaps more fundamentally, the providers then become pushed out of the collaborative process. This runs counter to everything ConnectKentucky is about, and hence, runs counter to the Broadband Data Improvement Act.

Mapping is just one component of the ConnectKentucky model, but it is an important one in that it brings together in a collaborative spirit the private and public sector. This mapping exercise helps seed the foundations of years of cooperation towards the implementation of broadband stimulation and education campaigns across the state. This is why visionary public leaders in Kentucky understood that building trust through a voluntary, non-regulated mapping collaborative was the most effective means of achieving the desired broadband inventory maps as well as the broader goals of increased broadband deployment and adoption.

- 3. The demand-side components of the Broadband Data Improvement Act must be linked with broadband mapping initiatives.** ConnectKentucky's mapping initiative was successful as a result of working collaboratively with broadband providers, but also because mapping was only one part of the more comprehensive program to understand localized barriers to broadband adoption, stimulate demand for broadband services, and increase technology literacy. The Broadband Data Improvement Act sets forth requirements that mirror ConnectKentucky's e-Community planning – a process whereby each community

² See Appendix A for a comprehensive list of volunteer mapping partners in Kentucky.

develops its own tactical plan for improving technology use and broadband adoption. This local component has been the cornerstone of ConnectKentucky's effectiveness, and it should continue to be a critical piece of our national broadband policy.

- 4. Computer distribution programs for disenfranchised families and communities are a key component of a successful local broadband stimulation program.** Early on ConnectKentucky learned that one of the key barriers to broadband adoption is the lack of computer ownership in the home. Computer ownership is a necessary prerequisite to being able to embrace the benefits of broadband technologies, yet for far too many families it is a prohibitive barrier. Over half of Kentuckians who are not connected to the Internet don't own a computer. A remarkable 41% of low-income children do not have access to a computer in their home.³ For this reason, ConnectKentucky included as one of our key components for broadband stimulation a program called No Child Left Offline, which brought together public and private collaboration to finance free computer donations for low-income children. Through its No Child Left Offline program, ConnectKentucky and its public and private partners have donated to date 3,102 computers.

One of ConnectKentucky's many success stories of cooperative public-private partnerships is found in rural Washington County, Kentucky, where local leaders have integrated all elements of the Broadband Data Improvement Act. Before ConnectKentucky began its broadband mapping work, Washington County officials already knew that a majority of rural Washington County residents did not have access to high-speed Internet. However, this ad hoc information was so generalized that officials could not develop a clear strategy for closing the digital divide. As ConnectKentucky worked with local broadband providers to map the broadband service throughout the county, local officials were able to identify – at both a macro and micro level – the unserved sections of each neighborhood and each road. A broadband inventory map of Washington County, KY can be found in Appendix B as well as at:

ftp://ftp.connectky.org/PUBLIC/Mapping/CountyMaps/CountyBroadband/Broadband_Washington.pdf

Meanwhile, under the leadership of Washington County Judge-Executive John Settles, local leaders from across the community came together to form an eCommunity team to plan for broadband expansion in Washington County. As in all 120 Kentucky counties, ConnectKentucky facilitated the meetings, provided the members with local research demonstrating how residents and businesses are using (or not using) broadband, offered ideas, concepts, and best practices for broadband applications and technology literacy programs in rural areas, and provided the process and structure for benchmarking and

³ According to the 2007 ConnectKentucky Technology Assessment, a statewide statistical telephone survey of more than 10,000 Kentucky households. Low-income is defined as annual household income less than \$25,000.

planning. However, it was the work of the eCommunity team itself that brought about the change. It took the local leaders of Washington County, empowered by a set of tools and resources, to develop a plan for broadband expansion, and then make it happen. A copy of the Washington County, KY, Strategic Technology Plan can found at: http://www.connectky.org/NR/rdonlyres/0234F5FF-F028-4693-B4B1-FE678E1854B7/0/1_WASHINGTONCOUNTYSTRATEGICTECHNOLOGYPLAN.pdf

At the request of Washington County government, ConnectKentucky engineers and GIS analysts used the broadband maps to design a proposed fixed wireless network for extending broadband service to rural Washington County. A copy of this proposal can be found in Appendix C. Using this network design, in combination with household density maps and broadband maps of the unserved households, ConnectKentucky developed a business case for a nearby fixed wireless Internet provider to invest in Washington County. Local officials worked to secure water towers and make them available for wireless antennae for a near county-wide broadband network, targeting the previously unserved areas. In 2007, 50% of Washington County homes had broadband available. Today, approximately 90% of Washington County residents can subscribe to broadband service. Hal Goode, economic development director of Washington County and one of the key local leaders in the county working together with ConnectKentucky to make this program a reality, spoke ardently about the success of the program in a letter written to the FCC last year, which can be found in Appendix D.

Similar testimonies from state and local leaders that have worked with ConnectKentucky to expand broadband infrastructure and adoption in their communities can be found in Appendix E.

Washington County serves as just one of the many illustrations of public-private cooperation through ConnectKentucky, resulting in increased broadband availability and adoption across our state. Please consider the significant effort from public, private and non-profit organizations working with Congress over the last two years to investigate the most effective strategies and methods for broadband growth – an investigation which culminated in the Broadband Data Improvement Act. The grant program in Section 106 of the Broadband Data Improvement Act provides the resources for states to develop public-private partnerships like ConnectKentucky. When all of the supply and demand elements of this grant program work cohesively in every community across a state, we witness growth not only in broadband availability, but also in broadband use. And it is this growth in broadband use that creates self-sustaining broadband networks.

Public-private partnerships are now serving as the foundation for successful broadband expansion in a number of states across our nation. As our federal government puts resources in place to build on states' efforts, I encourage you to strongly consider the elements of what has made public-private partnerships successful. Our nation has a

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window of opportunity to empower sustainable broadband infrastructure and use. We should think carefully about the details of what has worked, and why. A cooperative approach that protects the interests of both the public and private sectors will be critically important for the best return on the federal stimulus investment.

Respectfully,

A handwritten signature in cursive script, appearing to read "René True".

René True
Executive Director

APPENDIX:

- A. ConnectKentucky's Volunteer Mapping Partners
- B. Washington County, KY, Broadband Inventory Map
- C. Washington County, KY, Wireless Assessment
- D. Testimony from Hal Goode, Economic Development Director of Washington County
- E. Testimonies from state and local public sector partners of ConnectKentucky



Volunteer Mapping Partners

ACCESS CABLE TELEVISION
ACCESS KENTUCKY
ALTIUS BROADBAND
ARMSTRONG UTILITIES
AT&T
AT&T WIRELESS
BALLARD RURAL TELEPHONE COOPERATIVE
BARBOURVILLE UTILITY COMMISSION
BARDSTOWN MUNICIPAL UTILITIES
BIG SANDY TV CABLE
BLUEONE.NET - PENDLETON COUNTY
BOWLING GREEN MUNICIPAL UTILITIES
BRANDENBURG TELEPHONE COMPANY
BURGIN WIRELESS
CAINPRO COMMUNICATIONS
CEBRIDGE CONNECTIONS
CHAPEL COMMUNICATIONS
CINCINNATI BELL TELEPHONE
CINERGY COMMUNICATIONS
CITY OF BELLEFONTE
CITY OF RACELAND
COALFIELDS TELEPHONE
COMCAST CABLE
DUO COUNTY TELECOM
DUO COUNTY TELEPHONE COOPERATIVE CORPORATION
FOOTHILLS RURAL TELEPHONE COOPERATIVE CORPORATION
FRANKFORT ELECTRIC & WATER PLANT BOARD
GALAXY CABLEVISION
HARLAN COMMUNITY TV
HENDERSON MUNICIPAL POWER & LIGHT COMPANY
HIGHLAND TELEPHONE COOPERATIVE
HOPKINSVILLE ELECTRIC SYSTEM
INSIDE CONNECT
INSIGHT COMMUNICATIONS
INTERMOUNTAIN CABLE
IRVINE COMMUNITY TELEVISION
KEN-TENN WIRELESS, LLC
KVNET
KYWIFI
KYWIMAX
LESLIE COUNTY TELEPHONE

LEWISPORT TELEPHONE COMPANY
LIBERTY COMMUNICATIONS, INC
LIMESTONE CABLE VISION
LOGAN TELEPHONE COOPERATIVE
LYCOM
MAYFIELD ELECTRIC AND WATER SYSTEMS
MEDIACOM
MEGA-WI
MONTICELLO PLANT BOARD
MOUNTAIN TELEPHONE COOPERATIVE
NETPOWER, LLC
NEWWAVE COMMUNICATIONS
NORTH CENTRAL TELEPHONE COOPERATIVE
OHIO COUNTY DIRECT NET
OWENSBORO MUNICIPAL UTILITIES
PEOPLES RURAL TELEPHONE COOPERATIVE CORPORATION
PRINCETON ELECTRIC AND PLANT BOARD
PRITCHTECH
RIVERSIDE COMMUNICATIONS
RUSSELLVILLE ELECTIRC PLANT BOARD
SALEM TELEPHONE COMPANY
SCS WIRELESS
SHELBY WIRELESS
SIT-CO (FORMERLY OHIO VALLEY WIRELESS)
SOUTH CENTRAL RURAL TELEPHONE COOPERATIVE CORPORATION
SOUTHEAST TELEPHONE
SPEEDBEAM
SPRINT
SSINET
SUDDENLINK
TDS
THACKER-GRISBY TELEPHONE COMPANY
TIME WARNER CABLE
TV SERVICE & UNITED CABLE
US DIGITAL ONLINE
VERIZON WIRELESS
VORTEX WIRELESS
WEST KENTUCKY NETWORKS
WEST KENTUCKY RURAL TELEPHONE COOPERATIVE
CORPORATION
WILLIAMSTOWN CABLE AND INTERNET SERVICE
WIMAX EXPRESS
WINDSTREAM
WORLDWIDE GAP

Broadband Service Inventory Washington County Kentucky

Updated December 31, 2008

Submit questions or recommended changes to:
maps@connectednation.org



This map does not depict satellite broadband service.

The representations contained herein are for informational purposes only. Best efforts are undertaken to insure the correctness and accuracy of this information. However, all warranties regarding the accuracy of this map and any representations or inferences derived therefrom are hereby expressly disclaimed. Connected Nation and its partners neither assume nor accept any liability for the accuracy of these data. Those relying upon this information assume the risk of loss exclusively for any potential inaccuracy. All errors and omissions brought to the attention of Connected Nation will be promptly corrected.



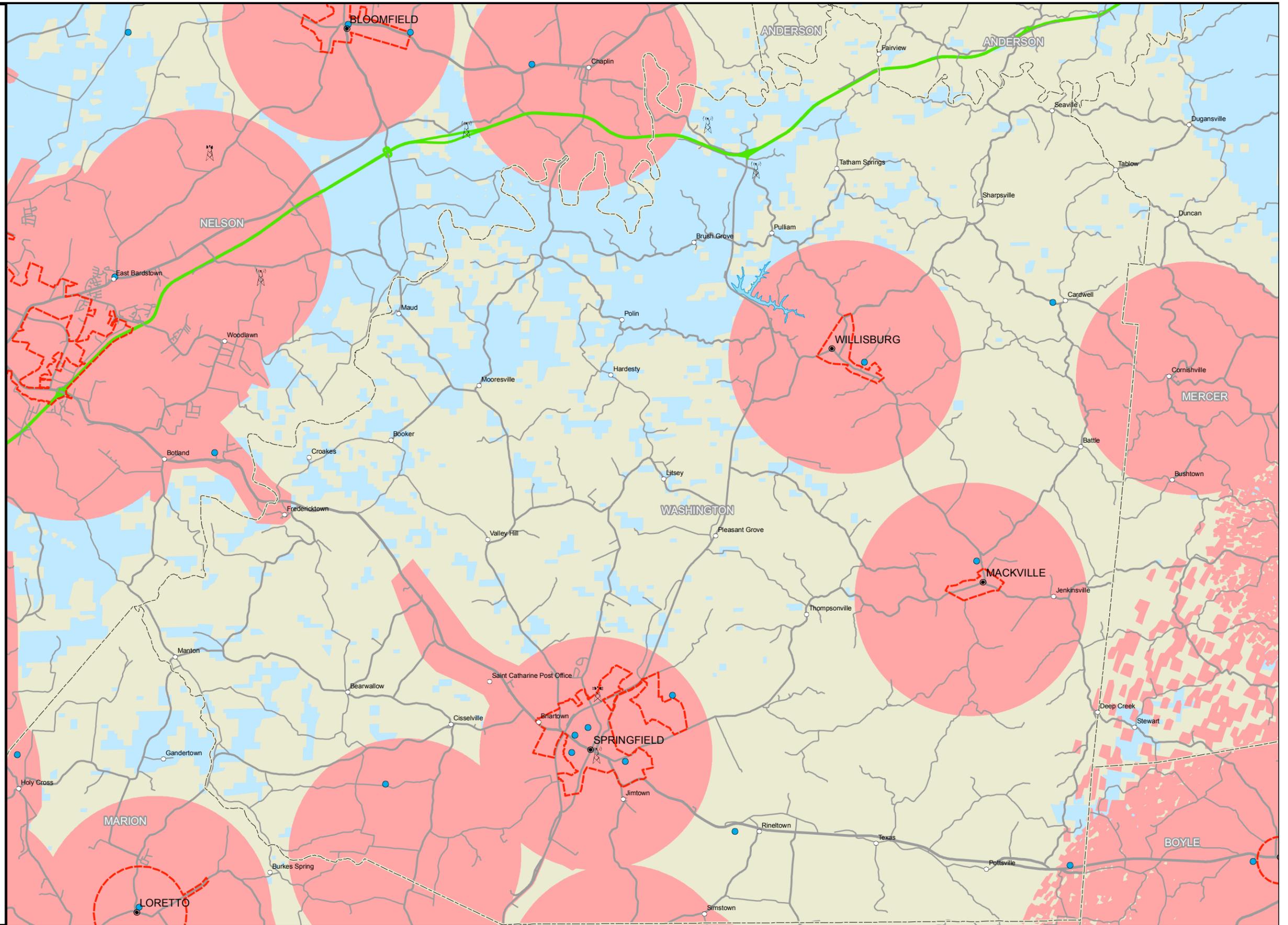
0 0.35 0.7 1.4 2.1 Miles

Symbology

- Incorporated City
- Rural Community
- Interstate
- Parkway
- US Road
- State Road
- Local Road
- - - Corporate Boundary
- - - County Boundary
- ⊠ CCI Tower
- ⊠ KEWS Tower
- ⊠ WISP Tower
- ⊠ SC Tower
- Water Tank
- Mobile Wireless Broadband Available
- Broadband Available
- Unserved Area



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CONNECT KENTUCKY WIRELESS ASSESSMENT FOR WASHINGTON COUNTY, KENTUCKY

Introduction: On July 18, 2007 ConnectKentucky's Wireless Business Analyst, along with Greg Ballard of KyWiMax, conducted a visual assessment of the Washington County area. The purpose of this assessment was to determine the feasibility of deploying a fixed wireless broadband Internet system in the county and to gather site specific information required for:

- determining the availability of potential transmit locations; and
- designing a wireless broadband system using these potential transmit locations; and
- expanding the broadband coverage into the under-served and non served areas of Washington County.

Transmit Locations:

There are approximately 22 broadcast tower sites within, or immediately adjacent to, Washington County. In addition to these 22 broadcast towers, there are at least 4 water tanks that could prove beneficial in the design and deployment of a wireless system.

During the site visit in Washington County Mr. Ballard and I met with Hal B. Goode - Executive Director of the Springfield-Washington County Economic Development Authority. Mr. Goode indicated that the proposed wireless initiative of KyWiMax was receiving general approval from the local governments and the Willisburg water district. This included the possible use of the water towers within Washington County.

The only area(s) which remain somewhat problematic are Mays Creek Road a.k.a. SR-438 and the area between Fredrickstown and Maud..

The optimal transmit locations that were analyzed for this report include 7 broadcast towers and 4 water tanks:

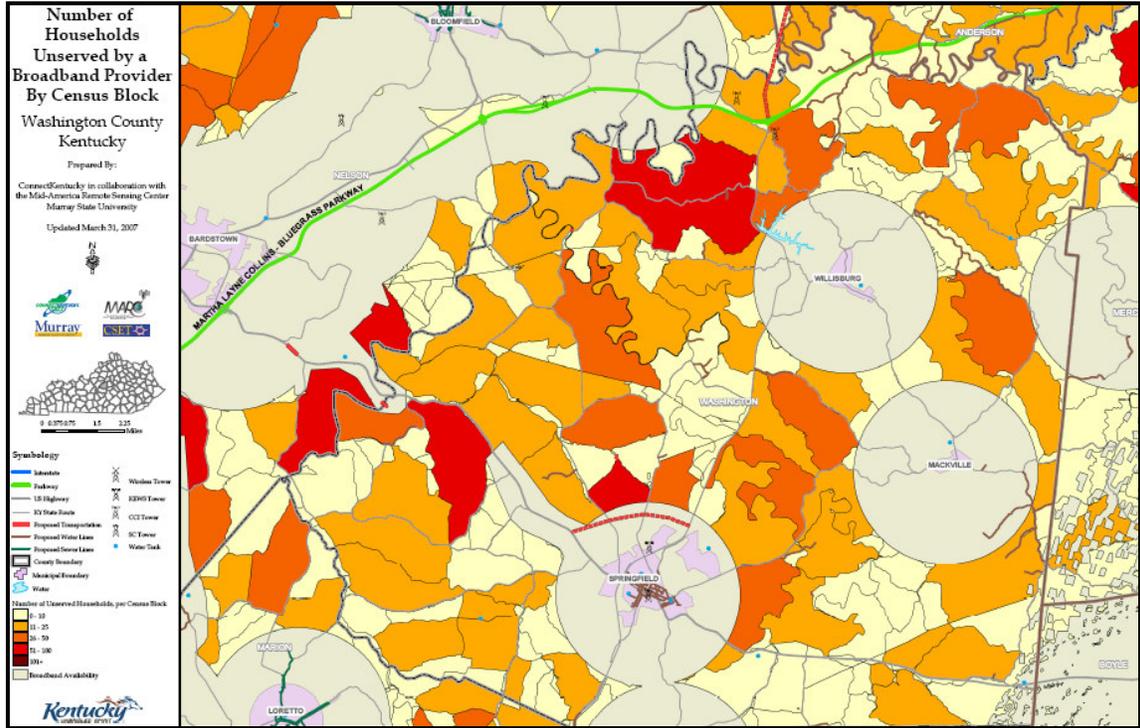
- Cloyd Lane water tank
 - Coordinates: 37° 48' 20.6" N x 85° 6' 48.9"
- Springfield water tank
 - Coordinates: 37° 40' 25.5" N x 85° 17' 58.3"
- Water tank #1
 - Located due South of the intersection of SR-53/390 and due East of the intersection of SR-53/433.
 - Coordinates: 37° 49' 24.8" N x 85° 2' 13.7 W

- Water tank #2
 - Located on SR-150 East near the town of Texas
 - Coordinates: 37° 39' 33.3" N x 85° 9' 58.6" W
- Broadcast tower (old AT&T tower owned by county)
 - Located near Mackville
 - Coordinates: 37° 44' 46.4" N x 85° 3' 55.6"
- TowerCo tower
 - Located on SR-150 East between Springfield and Perryville
 - Coordinates: 37° 39' 02.3" N x 85° 4' 43.3"
- CCI, 226 Main Street/Ballard Lane (Site # 811445 – 200 ft.)
 - Located in Springfield
 - Coordinates: 37° 41' 1.32" N x 85° 51' 10.44" W
 - POPs covered: 1,299.
 - This tower was also considered as a potential transmit location. It was determined, however, that the best use of this tower would be as a back haul hub interconnecting the transmit towers within the wireless system across Washington County. Additionally, this tower site will likely play host to the Internet point-of-presence for the entire system.
- CCI, 4040 Chaplin Road (Site # 816435 – 240 ft.)
 - SR 555 and Bluegrass Parkway
 - Coordinates: 37° 51' 55.64" N x 85° 9' 20.29" W
 - POPs covered: 1,299
- Kentucky RSA 4 Cellular General Partnership (FCC ASR # 1240441 – 190 ft.)
 - Coordinates: 37° 45' 22.00" N x 85° 19' 04.10" W
 - This tower was analyzed, however, it was determined that use of any unlicensed frequency could potentially interfere with the operations of MST Wireless in nearby Marion County.
- CCI, 2253 Ballard (Site # 800157 – 350 ft.)
 - Located in Anderson County
 - Coordinates: 37° 55' 32.34" N x 84° 59' 37.9" W
 - POPs covered: 1,347
 - This tower was also studied as a possible transmit site. The coverage into Washington County would be *de minimis*, however, this site may be useful as a backhaul location from nearby counties.

Crown Castle International (“CCI”) has been contacted by ConnectKentucky and they have expressed a willingness to allow access to their towers. CCI will negotiate lease rates that are below regularly published “rate card” fees. Other tower owners may not have rates as competitive as CCI. Consideration should be given for the use of local water towers and governmentally owned structures as possible substitutes for certain towers.

Washington County Demographics:

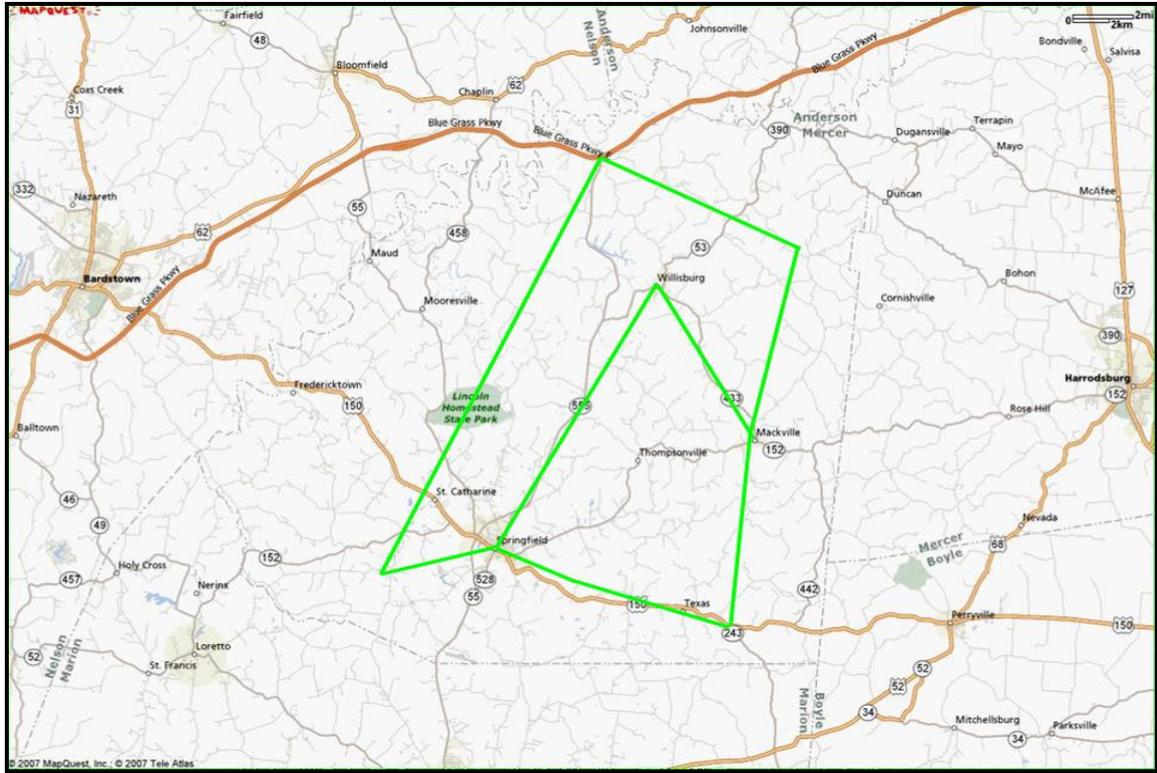
Estimated population:	11,491
Estimated housing units:	4,578
Estimated land mass in square miles:	300.59
Estimated population per square mile:	38.22
Estimated population of Springfield:	2,777



Line-of-Sight:

Studies were conducted to determine which towers, if any, could be interconnected with wireless point-to-point (“PTP”) links. Based on the initial assessment the following 9 towers could be interconnected to form the wireless equivalent of a fully redundant token ring SONET (see illustration on next page).

- Link 1: Crown Castle #811445 to Springfield Water Tank = 4.42 miles
- Link 2: Springfield Water Tank to Crown Castle #816435 = 15.39 miles
- Link 3: Crown Castle #816435 to Water Tank #1= 6.92 miles
- Link 4: Water Tank #1 to AT&T Tower = 5.56 miles
- Link 5: AT&T Tower to TowerCo = 6.64 miles
- Link 6: TowerCo to Water Tank #2 = 4.81 miles
- Link 7: Water Tank #2 to Crown Castle #811445 = 3.36 miles
- Link 8: Crown Castle #811445 to Cloyd Lane = 10.22 miles
- Link 9: Cloyd Lane to AT&T = 4.87 miles



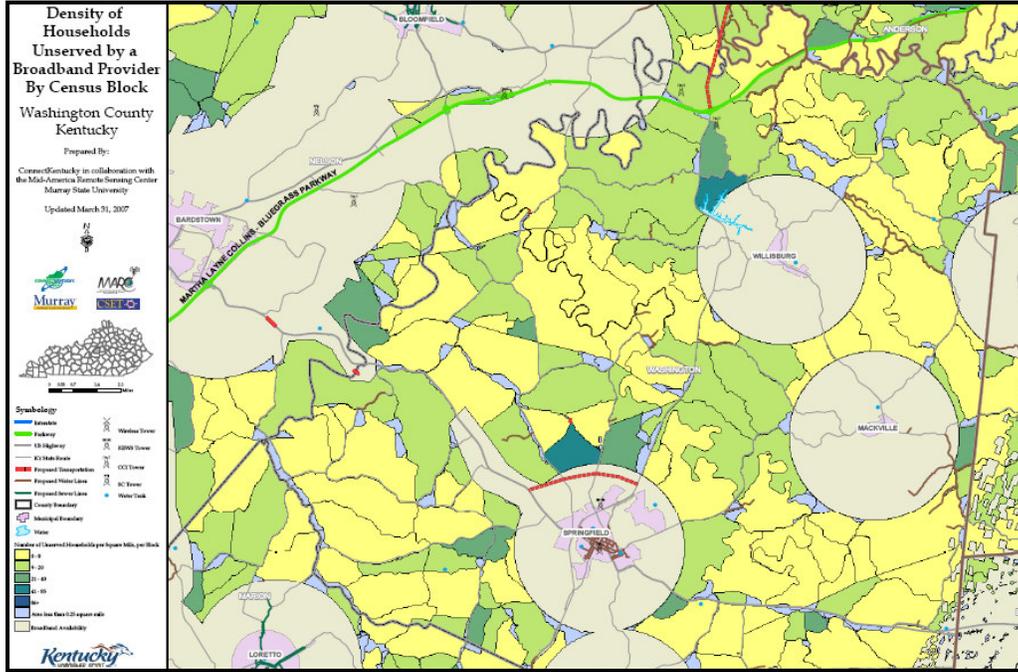
Topology and Morphology:

A wireless system design is often driven by the lay of the land (“topology”) and obstacles (“morphology”) that interfere with the delivery of wireless signals. The wireless footprint, or coverage area, must also have a balanced traffic model across the network. Traffic model characteristics were studied in minor detail for this document. The final system design and traffic model should be left to the determination of the operator. Therefore, ConnectKentucky’s analysis for this project focused on a number baseline assumptions for the actual wireless engineering study.

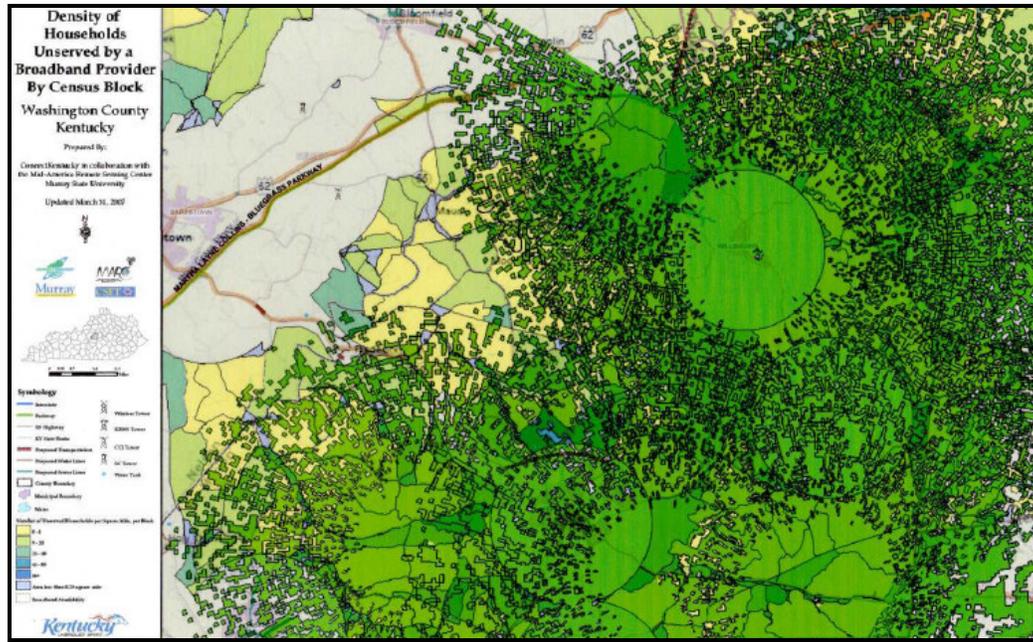
Baseline assumptions noted and included were:

- The terrain in Washington County consists of extreme rolling hills and bottom land making a wireless design geographically challenging. The majority of the county’s population resides near the roadways which are situated atop the ridgelines. The foliage consists primarily of deciduous hardwoods and is relatively dense throughout the entire county. For this engineering study a ground clutter interference factor of 10% was used in conjunction with a foliage interference factor of 75%.
- Ground clutter is very sparse throughout the region. Of the approximate 4,578 housing units in the county the majority are single family, single story dwellings. Multiple dwelling units (“MDU”) and multi-level homes appear primarily in the Springfield area.
- The 2.4 GHz frequency can be used in the highly populated areas to compensate for higher bandwidth applications and users. The 900 MHz band can be used to provide greater composite coverage throughout the county although at a lesser throughput speeds.

Washington County Before Wireless Broadband Coverage:



Washington County After Wireless Broadband Coverage:



Infrastructure Equipment Cost for Proposed Design:

Preliminary equipment and labor estimates are provided for reference only. It should be noted that total CAP-EX pricing is subject to the operator’s final decision on equipment selection and system design. This quotation does not include networking equipment, tower rental, and electricity at each site or Internet circuit costs as it is assumed that the Internet service provider (“ISP”) will be willing to pick up these costs. The equipment costs also does not include customer premise equipment, mounting brackets, connectors, CAT5e cable or other ancillary installation items.

Infrastructure equipment and labor is estimated to be approximately **\$102,734.80** for an area wide, high traffic build-out. This system was designed to provide maximum geographic coverage and to support 15% of the county’s households and/or 686 customers with simultaneous use. *This represents a build-out cost, per home passed, of \$22.44.* In each instance where a single omni-directional antenna (e.g. one 2.4 GHz Cyclone) is listed it is estimated that a minimum of 27 serviceable homes are included in the traffic model. Each omni-directional antenna site could be designed with 6 individual transmit antenna, each radiating in a 60° pattern. In doing so, traffic increases by 8 xs for each site while CAP-EX is increased by only 3 xs.

The additional cost estimated for the customer premise equipment could be as high at \$274,200.00. Accordingly, the composite cost per customer for this project is \$549.00 each (assuming 686 customer premise units and an equal pro-rata distribution for infrastructure costs).

Type	Equipment Type	Qty.	Cost	Equip. Totals
Tower	900 MHz Advantage Access Point	15	\$1,558.00	\$23,370.00
Tower	900 MHz 11 dBi 120° Antenna	12	\$385.00	\$5,005.00
Tower	900 MHz Omni-directional Antenna	3	\$585.00	\$1,755.00
Tower	5.2/5.7 GHz 20 Mbps Backhaul with Reflector	18	\$1,395.00	\$25,110.00
Tower	Cluster Management Module Micro	8	\$1,160.00	\$9,280.00
Tower	10' GPS Cable for Cluster Management Module Micro	8	\$25.85	\$206.80
Tower	Last Mile Gear – Canopy 2.4 GHz Cyclone (Omni)	5	\$2,585.00	\$12,925.00
Tower	Outdoor Double Shield CAT-5 Cable (500' roll)	8	\$455.00	\$3,640.00
Tower	APC/UPS Battery Back-up (30 minute standby)	5	\$2,000.00	\$10,000.00
Tower or CPE	8 Pin RJ45 Connector 50 Micron Gold (100 Pack)	3	\$36.00	\$108.00
Tower or CPE	Canopy Universal Mounting Brackets	40	\$16.50	\$660.00
Tower or CPE	1-2" Round Member Adapters (1 dozen)	5	\$35.00	\$175.00
Tower	Labor per Day	6	\$1,750	\$10,500.00
Infrastructure Only – No Customer Premise Units				\$102,734.80

July 9, 2008

Dear Chairman Martin:

As an economic development professional of a Kentucky county that has recently implemented a public broadband project, I believe it is my duty to give you a first-hand account of the support and assistance that ConnectKentucky has brought to our municipality and the rural citizens of our county. I understand there are allegations that ConnectKentucky does not support municipal broadband projects; however, this is simply untrue.

ConnectKentucky worked with us, the Washington Fiscal Court and the City of Springfield, to determine the best solution for expanding broadband into the rural areas of Springfield and Washington County. While it is evident that ConnectKentucky works with local officials and broadband providers in Kentucky to bring the highest bandwidth solutions to each citizen and business, ConnectKentucky is also realistic enough to understand that there is not always a viable business case for fiber to every home – which was the case for us – we simply did not have the funding for a fiber optic system, nor did our citizens want to be taxed for it. Fiber was simply not a feasible or sustainable option. And so ConnectKentucky listened to our needs and recommended a fixed wireless system to bring broadband to our residents and businesses who had nothing but dial-up for the foreseeable future.

When we needed a partner in this effort to provide the broadband services, ConnectKentucky introduced us to a wireless Internet service provider, KyWiMax – a small, Kentucky-based company which has developed successful wireless solutions through other projects in Boyle, Lincoln, and Garrard Counties.

But ConnectKentucky did not stop with a recommendation and introduction. Using the detailed maps that they create, ConnectKentucky conducted an extensive engineering assessment of our county's unserved areas, identifying vertical assets such as water towers and existing cell towers that could be used for the network. And as a result, we have been able to construct a network without building any additional towers, using our existing resources in partnership with Springfield Water and Sewer and cellular companies. It was ConnectKentucky who brought all of these players together and conducted the technical work to enable the project's success. ConnectKentucky did not charge us for any of this work, of course, because this is part of what they do for local officials throughout our state.

The broadband project implementation is well underway. At project completion, over 90% of Washington County's households will have access to broadband. That's up from 50% of households just last year. Many residents and businesses are now using broadband for education, healthcare, government services, working from home, buying and selling products online, and a whole host of other activities that dramatically improves their quality of life.

As you work to determine the best course for FCC action in mapping broadband availability, I encourage you to develop policies that will encourage public-private partnerships like ConnectKentucky to continue to thrive. These grassroots-led programs not only do an excellent job of mapping broadband availability, but they also provide a tremendous resource to local governments as we work to find information technology solutions for our citizens.

Thank you for your consideration.

Sincerely,

Hal Goode
Springfield-Washington Economic Development Authority

cc:

Commissioner Jonathan Adelstein
Commissioner Michael Copps
Commissioner Robert McDowell
Commissioner Deborah Tate



Commonwealth of Kentucky

Magistrates

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Magistrates

Gary Veirs

Stacey Wells

July 19, 2008

Chairman Kevin J. Martin
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Dear Chairman Martin:

I am writing today to tell you the story of how Pendleton County, Kentucky got broadband, in hopes that it might help as you work toward addressing America's broadband gap.

Less than two years ago, Pendleton County had virtually no broadband service available for our rural citizens. Our rural areas are simply too sparsely populated for the telephone and cable companies to sustain viable networks.

Fortunately, there is a nonprofit group in our state called ConnectKentucky. The folks at ConnectKentucky work with communities across the state to bring broadband to everyone. Three years ago, ConnectKentucky reached out to me and helped me pull together a team of local community leaders, and together we developed an action plan for not only filling our broadband gaps, but also for creating effective broadband applications to enable citizen services, and for generating awareness about the benefits of broadband to increase the actual use of these services.

I am proud to say that this effort has been extremely successful. ConnectKentucky helped us identify a small broadband provider, Blue One, whose technology and business model fits our rural market. Blue One partnered with the Pendleton County Fiscal Court to deploy an extensive wireless network to our rural residents who had nothing but dial-up. As a result of our work, these citizens and businesses of Pendleton County are now part of a global economy. When we started this process in 2005, less than 50% of Pendleton County residents could subscribe to broadband. Now more than 90% of residents have broadband or have access to broadband in a county where the largest city has a population of around 2,000.

But there is an important part of this story that never gets told – none of this would have been possible without ConnectKentucky’s broadband maps and on-site work to make sure these maps are complete and useful. The ConnectKentucky folks get out in the mud with locals and service providers to understand exactly which homes have broadband available and which do not – and these maps are always up-to-date on their website for everyone to use. These maps allowed us to pinpoint the areas where broadband service was not available – and the areas where broadband service would not be available anytime soon. The maps also allowed us to target our public funds for broadband deployment in those areas where it was most needed.

Without the ConnectKentucky maps and the work of ConnectKentucky staff in the field to keep the maps current and accurate, Pendleton County would never had had the tools to develop our network, and we would very likely still have more than half of our residents without broadband.

I understand the FCC is considering doing this type of broadband mapping. As you contemplate this process, I urge you to leave broadband mapping in the hands of public-private partnerships such as ConnectKentucky. Many government entities have tried, and failed, to produce accurate and comprehensive broadband availability maps. Fortunately, there are groups out there who can bring together local leaders and broadband providers of all sizes and technology types to accurately map broadband in a way that is useful for all of us. Pendleton County is proof that this process works.

I also understand that other states need broadband maps like Kentucky’s map. The best thing the FCC could do is to find a way for these types of public-private partnerships to flourish in other states. An FCC mapping program could very well squash these efforts. And these are the very broadband maps that have proven to work.

Thank you for your consideration and for your continued work to expand broadband to all Americans.

Sincerely,

A handwritten signature in blue ink that reads "Henry Bertram".

Henry Bertram
County Judge Executive
Pendleton County

cc:

Commissioner Michael J. Copps
Commissioner Jonathan S. Adelstein
Commissioner Deborah Taylor Tate
Commissioner Robert M. McDowell

City of Monterey

Dennis Atha, Mayor
610 Monterey Pike
Owenton, Kentucky 40359

July 14, 2008

Dear Chairman Martin,

Thank you for your efforts to ensure that all citizens have access to broadband. This issue is particularly important to me, as I have seen Monterey, Kentucky go from dial-up to broadband within the last year.

Our small community is full of artisans and craftsman who can now sell their products all over the world. We would probably still be on dial-up if it weren't for ConnectKentucky bringing us together with Southeast Telephone to build support and find funds for broadband infrastructure.

It has recently come to my attention that ConnectKentucky has been accused of being "dominated" by incumbent telephone companies and that the ConnectKentucky maps are not accurate. I speak from direct experience when I tell you that these claims are false and entirely unfounded – and ConnectKentucky's work in Monterey stands as testament to this fact.

To begin with, the broadband provider which was identified by ConnectKentucky to best serve Monterey is *not* an incumbent telephone company, but is a competitive local exchange carrier, Southeast Telephone, which works to serve Kentucky's rural areas. This company is just one of the many small, local broadband providers that ConnectKentucky works with in our region and across the state to ensure all citizens have access to broadband.

In regard to ConnectKentucky's maps – these are the tools which laid the groundwork for our strategy to deploy broadband to Monterey and surrounding areas that had no service. These mapping tools are essential in identifying citizens who do not have access to broadband. ConnectKentucky has achieved what no one else could do – it brought together all the right players and invested significant resources to map broadband availability in a comprehensive and accurate fashion. I saw firsthand how the process works – ConnectKentucky works with providers – big and small – to gather information on where broadband service exists, and then they work with local communities, businesses, and citizens to make sure the map is correct. And then ConnectKentucky produces these maps and all kinds of related tools on its website for all to use. To say that these maps are not transparent or not useful is an injustice – and is utterly ridiculous. This process for cooperative mapping is a model that should not only be heralded, but should be used again and again for the rest of America.

I was delighted to hear of the growth of ConnectKentucky's work to other states, and I now understand that several states have maps similar to the ConnectKentucky maps. It is my hope that the FCC can use this successful ConnectKentucky model as a guide in leading America to broadband solutions for everyone.

Again, thank you for your work on this important issue.

Respectfully,



Dennis Atha
Mayor
City of Monterey

cc: Commissioner Jonathan Adelstein
Commissioner Michael Copps
Commissioner Robert McDowell
Commissioner Deborah Tate

Brent Graden
Director of Economic Development
City of Prestonsburg
200 North Lake Drive
Prestonsburg KY 41653
606-886-2335
606-226-9353

Federal Communications Commission

To Whom it May Concern:

It has recently come to my attention that Connected Nation, a non-profit whose goal is to help bridge the digital divide in communities across America, has recently come under attack from municipal utility broadband providers. They question the value of programs like ConnectKentucky and are trying to stop Federal support to expand their mapping process into other states.

It is my opinion that ConnectKentucky and other programs like it are an invaluable tool to help communities help themselves. Their invaluable leadership and knowledge base helps to create a public-private partnership that stimulates the local economy, promotes education, increases tourism and development, and offers increased access to broadband in underdeveloped or rural areas.

As the Director of Economic Development, it my job to find new and affordable ways to grow the local economy while not breaking the bank. Through the leadership of ConnectKentucky and local politicians, it was determined that we wanted to stimulate the local economy through technology. It was further determined that we would use a wireless internet network to accomplish this task. Meraki Networks was used to set up a wireless mesh network throughout the downtown and points of interest. After 22 weeks of initial testing, we have experienced over 3800 unique users who downloaded over 650GB of information. The reason I mention this point is that The City of Prestonsburg has experienced significant growth. In a period of 45 days after the initial announcement, we were able to attract twenty new business and create 43 new jobs. Our year-over-year general revenues increased by \$111,410. Whether directly or indirectly, I attribute our growth to hard work, recruitment, and proper infrastructure such as our wireless mesh system. When citizens have improved access to information and technology, you will see a better and healthier community than before. Our goal is progress, not profit.

Our city is not unique. As technology improves and products become faster, better, and cheaper, the common consumer will take advantage of it. Whether it is a company like Meraki Networks or current providers like AT&T, Verizon or other municipal utilities, it is up to individuals to compete in the marketplace and to make their product or service the most innovative and not the most exclusive. This country has been served well by its innovation and it is up to programs like ConnectKentucky and Connected Nation to keep America strong and growing.

Sincerely,

Brent Graden
City of Prestonsburg

July 8, 2008

Dear Chairman Martin:

I write to urge you to consider a cooperative, public-private approach to mapping national broadband availability.

As director of the Green River Area Development District (GRADD) in western Kentucky, I have been part of a remarkable regional project that is now culminating in a broadband wireless network that spans seven rural counties – an area roughly the size of Delaware. This project, named ConnectGRADD, is led by the seven county judge executives of the region, and was undertaken to help bridge the urban-rural digital divide by expanding affordable, high-speed broadband access to our rural residents.

Chip Spann, and other staff members from ConnectKentucky, provided valuable assistance in helping us develop an RFP for network construction and service provision. Mr. Spann served on a local committee that made the recommendation to our Selection Committee; his knowledge of wireless technology was invaluable in providing the local Judge Executives a level of confidence in the winning proposal. Ultimately the winning bid came from a collaborative effort between Digital Connections Inc (DCI) and Cinergy Communications. Mr. Spann continued to consult during the contract negotiations with the winning bidders.

As you and your colleagues at the FCC work to develop national broadband policies, I encourage you to find creative ways that you could use the ConnectKentucky model.

Thank you for your work to ensure all Americans have access to broadband. I believe that ConnectGRADD proves that this goal is possible, if we work together to make it happen.

Respectfully,

Jiten Shah
Executive Director

Green River Area Development District

cc:

Commissioner Jonathan Adelstein

Commissioner Michael Copps

Commissioner Robert McDowell

Commissioner Deborah Tate

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Received & Inspected

AUG 12 2008

FCC Mail Room

July 25, 2008

Ms. Marlene H. Dortch
Secretary, Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

ORIGINAL

Re: **Notice of Ex Parte Communication**

Notice of Ex Parte Communication in the Matter of WC Docket 07-38 (Broadband Data Collection)

Dear Ms. Dortch,

Today I sent the attached letter to Chairman Kevin J. Martin with copies to Commissioner Michael J. Copps, Commissioner Jonathan S. Adelstein, Commissioner Deborah Taylor Tate, and Commissioner Robert M. McDowell.

Sincerely,



Mark David Goss
Kentucky Public Service Commission Chairman, 2004 - 2008

No. of Copies rec'd _____
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July 25, 2008

Received & Inspected

Chairman Kevin J. Martin
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

AUG 12 2008

FCC Mail Room

Dear Chairman Martin:

From 2004 through the first half of 2008, I was honored to serve as chairman of the Kentucky Public Service Commission. It was during this period that the public-private partnership of ConnectKentucky initiated its statewide program to expand broadband availability and adoption.

My primary goal as chairman of the Kentucky PSC during these last four years was to enable policies that would effectuate the highest quality services for all Kentucky consumers. One of our most innovative and successful means for achieving this end proved to be ConnectKentucky.

The most visible and talked-about element of the ConnectKentucky initiative is its effective broadband mapping process, and it is understandable that both the Federal Communications Commission and Congress are seeking methods to build upon this program and the many success stories generated in communities across the Commonwealth as a result of ConnectKentucky's work.

ConnectKentucky's mapping effort was preceded by years of research and discussions with state agencies, local officials, economic development organizations, business leaders, consumers, and broadband providers. Their statistical surveys and this constructive dialogue culminated in a collaborative approach to broadband expansion which has been broadly supported by Kentucky government at all levels.

Because the state of Kentucky has been such a leader in smart broadband policy that tackles both broadband access and adoption, I believe it is critical for the rest of the nation to learn from our experiences and our work that began under Democratic Governor Paul Patton, continued under Republican Governor Ernie Fletcher, and fortunately for the citizens and businesses of Kentucky, is continuing today under the leadership of Democratic Governor Steve Beshear.

Perhaps what is most remarkable for the state of Kentucky is that we have been able to overcome politics and come together across multiple administrations to enable progressive action for Kentucky consumers. We have worked together in a bi-partisan way, and we have learned as we go, working in cooperative ways that some said would never work. Of course, there will always be those few politically motivated voices that still try to hold fast to the claim that this cooperative method is not the right way. There are those who will claim that ConnectKentucky is a front for broadband providers and that all data – regardless of how proprietary and regardless of how its release could negatively impact consumers – should be made transparent on every level. But I urge caution in your assessment of these arguments, and I encourage you to take a close look at the hard evidence that clearly demonstrates the tremendous impact of the cooperative ConnectKentucky approach, and the potential impact of this approach for all Americans.

There are several elements to this collaborative, public-private approach that make it work so well. One element is ConnectKentucky's interactive broadband map, which serves as the foundational tool for the rest of the ConnectKentucky program. The web-based format of the map allows any Kentucky consumer to enter his or her address and receive a list of broadband providers serving that address, along with a hyperlink to each provider's website. The interactive format allows consumers, policymakers, economic developers, prospective businesses, or anyone else to drill down to any neighborhood or street and clearly see the different types of broadband technologies available.

Although some will argue that heavy regulation is necessary for accurate and transparent data, ConnectKentucky has proven that the data obtained through a collaborative approach is much more accurate than what could be achieved through government regulation. And ironically, the public-private partnership structure itself enables a much greater level of transparency than what government could provide to consumers. It is critical to remember that the preliminary technical network data that ConnectKentucky originally receives from broadband providers is meaningless to consumers. The real value in ConnectKentucky's mapping program is not even that it gets around the proprietary issues involved with the provider data, but rather in ConnectKentucky's work in the field with broadband providers to gather the data necessary for the map, then translate it into GIS format, and finally represent the data in the most public and transparent of formats so that the consumer can be the ultimate judge of the data.

In fact, one of the reasons the ConnectKentucky map is so effective for consumers is that there are extensive and readily accessible processes in place for consumers to "check" the maps and notify ConnectKentucky if there are errors in the data. Because the Kentucky Public Service Commission retains legislative authority to investigate and resolve consumer complaints, ConnectKentucky's sophisticated process of consumer verification of the broadband maps has been a tremendous help to the Kentucky Commission. While the Kentucky Commission fields around 100 calls per year from consumers who want to help correct the map or who want broadband and can't get it, ConnectKentucky fields hundreds of calls each month from these same consumers, and this verification system results in a map of broadband availability that is open-access with interactive data that is readily verifiable for *consumers themselves*.

Indeed, the Kentucky Public Service Commission filed comments in this proceeding calling for data that is "readily verifiable and subject to independent scrutiny and analysis." Fortunately, the ConnectKentucky maps have just such a system in place. Meanwhile, the underlying proprietary infrastructure data – which would be meaningless for verification purposes but potentially very harmful to consumers – is protected. As a result, consumers themselves have a direct route to verify the broadband data.

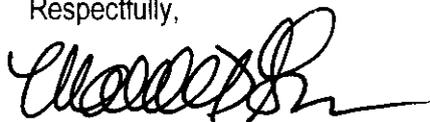
The rest of the story comes with how this dynamic and evolving broadband map is actually used and continually updated in Kentucky's communities. Local leaders across the state work hand-in-hand with ConnectKentucky technicians in the field to develop local teams for actionable technology growth across all sectors of the community – healthcare, education, government, business, and others. The result is a statewide movement of community-specific solutions to bridge the digital divide. One of the more prominent programs borne from this movement is No Child Left Offline – which began as a partnership between private sector donors and the state of Kentucky to refurbish state computers and place these computers in the homes of Kentucky's low-

income children. No Child Left Offline has now expanded into other states and is delivering new computers to thousands of underprivileged children who would otherwise grow up without technology access at home.

As you work toward progressive solutions for America's consumers, I encourage you to look closely at the ConnectKentucky program to understand its bold and solutions-based approach that works for the benefit of consumers. There will be a select few politically-driven and self-interested voices who will argue that state-based public private partnerships are not the best solution for America, but there are thousands of Kentuckians who would strongly disagree. They include the local officials in towns throughout Kentucky who worked directly with ConnectKentucky to develop creative solutions to fill the broadband gaps. They also include the many small, local broadband providers who have worked directly with ConnectKentucky to offer these creative solutions. And of course, they include the thousands of consumers in rural homes across the state who are now part of the Internet Age as a result of ConnectKentucky.

This public-private approach holds the potential for effectively mapping national broadband availability, while simultaneously establishing a monumental grassroots campaign for using these maps to fill America's broadband gaps. The Federal Communications Commission has a great opportunity before it to act in a progressive way for all Americans. I encourage you to make the most of Kentucky's experience, and establish a national broadband policy built on public-private partnerships.

Respectfully,



Mark David Goss
Kentucky Public Service Commission Chairman, 2004 - 2008

cc:

Commissioner Michael J. Copps
Commissioner Jonathan S. Adelstein
Commissioner Deborah Taylor Tate
Commissioner Robert M. McDowell