



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 2025

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

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

Today, more than ever, Americans need access to broadband. We know that when broadband is available and used, jobs are created, businesses are more efficient, healthcare is improved, and education becomes more efficient and more effective. Broadband is now widely recognized as a critical component to every community's infrastructure and every citizen's path to a brighter future. Quite simply, access to broadband is a critical foundation for our nation's economic recovery.

President Obama and Congress have taken important measures to close our nation's digital divide by allocating broadband provisions in the American Recovery and Reinvestment Act (ARRA).

Key components of the package include \$7.2 billion for the NTIA Broadband Technology Opportunities Program (TOP) and for the USDA Rural Utilities Service, including \$350 million to fund statewide public-private partnerships for broadband mapping and increased broadband adoption, as Congress called for in the Broadband Data Improvement Act—enacted in the fall of 2008. Unanimously Congress agreed in the Broadband Data Improvement Act that public-private partnerships which focus on cooperative, voluntary broadband mapping and effective demand stimulation efforts at the local level are in America's best interest.

With the ongoing implementation of the ARRA and the Broadband Data Improvement Act, all elements of the broadband sector are poised to implement the vision that Congress intended for a national broadband strategy. Connected Nation, an organization that has inspired innovative ideas contained within this vision, is one of those entities ready to follow the steps delineated by Congress. Connected Nation, along with its partners, is ready to work with federal, state and local authorities to advance Congress's vision for a collaborative public-private partnership model to promote broadband across the nation.

At this important juncture, a select few inside-the-beltway voices are attempting to convince the world that Connected Nation is illegitimate. Recently, Public Knowledge published and filed as comments to the Request for Information in Docket Number 090309298-9299-01 false allegations that seek to discredit Connected Nation's accomplishments.

Public Knowledge's allegations can be summarized as this:

- Connected Nation is a front for a private-sector conspiracy dominated by large broadband providers - an allegation that conveniently fails to acknowledge the vast number of official and unofficial national and state level partners of Connected Nation, as well as the scores of testimonies from individuals and communities that have benefited from the work of Connected Nation's mapping or public-private partnerships.
- Connected Nation's broadband inventory maps are not verifiable and transparent, represent only select providers, and attempt to conceal data. In reality, Connected Nation's state maps are published online and made available for address level searches and full public scrutiny of household level data that has been submitted by hundreds of broadband providers of all platforms and company size, private and public alike.

For over a year, Connected Nation has focused on continuing its efforts to produce real results that benefit real people across the United States. Frustrated that organizations like Public Knowledge are trying to undermine the work we passionately believe in by irresponsibly publishing fraudulent and unsourced allegations, we seek here to set the

record straight by reminding public leaders and broadband stakeholders at large of the facts about Connected Nation.

- Connected Nation's national partners include: the American Academy of Nursing, the American Farm Bureau Federation, the American Homeowners Grassroots Alliance, AT&T, the Children's Partnership, Cisco Systems, Comcast, the Communications Workers of America (CWA), CTIA, the Entertainment Consumers Association, the Information Technology and Innovation Foundation (ITIF), Intel Corporation, the Internet Innovation Alliance, the Joint Center for Political & Economic Studies, the Kansas Farm Bureau, Microsoft, the Minority Media and Telecommunications Council, the National Association of State Chief Information Officers, the National Cable Telecommunications Association, the National Consumers League, the National Grange, NIC, the Telecommunications Industry Association, the Phoenix Center for Advanced Legal and Economic Studies, the U.S. Chamber of Commerce, USTelecom, Verizon, Voyant International Corporation, and the World Institute on Disability.¹
- Connected Nation state-level partnerships include multiple other public and private organizations representing diverse interests and constituents across the state.²
- Connected Nation receives the bulk of its funding through its work with state governments for providing mapping and research services as well as implementing grassroots programs to increase broadband adoption. These include community technology planning and programs that provide computers and connectivity to those who otherwise could not afford them.³
- The main goal of Connected Nation is to work with community leaders to stimulate adoption of broadband services and, in turn, promote investment in network infrastructure build-out. Connected Nation has already established approximately 300 local technology planning teams in as many counties across the nation (representing more than 6,000 local volunteers from both the public and private sectors) that today lead their communities towards greater access to and use of broadband and IT technology.⁴

¹http://www.connectednation.org/who_we_are/national_advisors/ (where you can also see a list of Connected Nation's Board of Directors)

²<http://www.connectkentucky.org/partners/>, <http://www.connectedtennessee.org/partners> and <http://connectohio.org/partnership>.

³http://www.connectednation.org/who_we_are/corporate_transparency.

⁴Information for each county's Technology Planning Process can be found at the following sites: http://www.connectkentucky.org/find_your_county/counties; http://www.connectedtennessee.org/find_your_county; and http://connectohio.org/mapping_and_research/county_profiles.

- Connected Nation is committed to putting quality technology in the hands of children and families that need it most. To date, Connected Nation has distributed 4,992 computers to underprivileged children and community centers.
- Connected Nation has also helped more than 770,000 households, or approximately 1.87 million U.S. citizens, upgrade to broadband from dial-up Internet service.
- In Kentucky, broadband adoption rates doubled between 2004 and 2007, when ConnectKentucky began its broadband initiative.⁵ Since the inception of Connected Tennessee, broadband adoption in the state has increased by nearly 26%, compared to a national increase of approximately 15% over a similar time period.⁶ In July 2007, Tennessee's broadband adoption rate was seven percentage points lower than the national average; today that gap is reduced to a three-percentage-point difference.⁷ In addition, in Tennessee 84% of adults today report that they use the Internet, compared to a national average of just 74%.⁸
- Minority populations also are benefiting from these programs. In Tennessee, computer ownership increased by 5% among minorities from 2007 to 2008, compared to stagnant national growth during the same period. Significantly, among low-income minorities, computer ownership increased by 19% within this same one-year period.⁹
- In short, these programs work and create jobs. Since the work of ConnectKentucky began in 2004, information technology jobs in the State have reversed previous declines, growing by more than 3.1 percent over the past four years, while national trends declined by -4.2 percent.¹⁰

Connected Nation has worked since its inception to continually improve its ability to achieve measurable results, learning from its experiences and using that experience to develop best practices. These results, and the countless testimonies from Americans that have been directly impacted by our partnership efforts, speak for themselves. See the

⁵2004 figure comes from the 2004 University of Kentucky e-Commerce Survey; 2007 figures come from the 2007 ConnectKentucky® Residential Technology Assessment.

⁶Tennessee figures come from July 2007 and January 2009 Connected Tennessee® Residential Technology Assessments. National averages come from surveys conducted by the Pew Internet and American Life Project.

⁷Ibid.

⁸Tennessee figure comes from January 2009 Connected Tennessee® Residential Technology Assessment. National average comes from a December 2008 survey conducted by the Pew Internet and American Life Project.

⁹“The Call to Connect Minority Americans: A Connected Nation Policy Brief.” Available at http://connectednation.com/_documents/cn_minority_policybrief_final_031609.pdf.

¹⁰United States Bureau of Labor Statistics (www.bls.gov); percent change in information sector employment from January 2005 through December 2008.

Appendix for a selection of testimonials from state and local leaders working “in the mud” with Connected Nation and its programs. Further, Connected Nation has been scrutinized by respected third parties, including *The Wall Street Journal*,¹¹ *The Economist*,¹² *Business Week*,¹³ *Forbes*¹⁴ and most recently, an independent study from Michigan State University.¹⁵

Outside the Beltway, where the people of America are working everyday to bridge the digital divide, Connected Nation’s work – particularly its widespread technology literacy programs that place computers into the homes of low-income children and other underserved groups – is routinely showcased as a best practice that creates real results that positively impact people's lives.¹⁶

Public Knowledge has invested significant energy alleging that Connected Nation’s maps are not accurate, verifiable, or transparent. Connected Nation has completed or is in the process of generating broadband inventory maps in nine states and is a market leader in broadband inventory mapping. Public Knowledge’s position fails to accept the basic facts about Connected Nation’s maps and the challenges of broadband inventory mapping generally. And, oddly for an organization with such a name, Public Knowledge is actively working to undermine continued development of this essential tool to contribute to our public knowledge about the state of broadband and inform sound public policy across the country. This allegation goes beyond the boundary of public policy debate, instead attacking the integrity and reputation of Connected Nation, and we want to set the record straight and remind stakeholders of the basic, publicly available information regarding Connected Nation mapping.

- Connected Nation’s broadband maps are granular at the household level in order to ascertain where the specific gaps in the network exist. Any other method for determining availability of broadband services (such as using zip-code or census tract data) will grossly overestimate the true extent of the network. In Minnesota, the latest state where Connected Nation has produced a map, inventory maps show 94% of households have broadband available. If broadband availability were measured by Census Block Group, Minnesota would appear to have 96.4%

¹¹<http://online.wsj.com/article/SB121676442873775111.html?mod=JR-Econ-Development-July-2008>.

¹²http://connectednation.com/in_the_news/connected_nation_in_the_news/Article_WiringruralAmerica_91307.pdf.

¹³http://www.businessweek.com/technology/content/feb2009/tc2009024_299232.htm?campaign_id=rss_daily.

¹⁴http://www.forbes.com/2009/01/22/kentucky-wired-cities-tech-wire-cx_ew_0122kentucky.html.

¹⁵<https://www.msu.edu/~larose/ruralbb>.

¹⁶See selected samples at <http://www.wbbjtv.com/Carroll%20Academy%20Grant.html>;
http://www.bizlex.com/Articles-c-2009-03-18-85712.113117_Online_Advantage.html;
<http://www.wsaz.com/news/headlines/39774892.html>;
<http://www.morningjournalnews.com/page/content.detail/id/509770.html>;
<http://www.wmfd.com/newsboard/single.asp?Story=34980>; and
http://www.wmctv.com/Global/story.asp?S=9913531&nav=menu59_2.

broadband deployment. If availability were measured by Census Tract, deployment in the state would be grossly overestimated at 99.6%.¹⁷ These figures are strong evidence that granular, household-level maps are necessary. Fortunately, Congress very explicitly called for such granular maps in the Broadband Data Improvement Act.

- The only means to get such information is directly from the broadband providers themselves. Therefore, mapping can only be accomplished in collaboration with the provider community, following the intent of Congress in the Broadband Data Improvement Act. Some, including Public Knowledge, argue that somehow this detailed, proprietary data can be obtained by well-meaning boy scout and girl scout troops surveying the land.¹⁸ We will let the public determine whether that is a viable means to obtain data that will inform telecommunications public policy for years to come.
- Connected Nation has a long track record of working with providers to produce maps. Through the years it has earned the trust of more than 300 broadband providers nationwide of all sizes and technology types, who have established voluntary data-sharing relationships with Connected Nation.¹⁹ Connected Nation does not charge fees to providers for participation in the mapping projects. On the contrary, Connected Nation aims to reduce the burden for providers of developing accurate, verifiable maps of their broadband service territory so that public policy can be more fully informed and broadband investment dollars targeted to the areas where service doesn't exist.
- Public Knowledge argues that maps developed through a public-private partnership, in a voluntary and collaborative spirit, are not to be trusted because the data cannot be verified. This is plainly false. In fact, anyone can access Connected Nation's interactive broadband maps online, with the ability to search by address or view gaps at the county or statewide level. These maps allow online users to search for available broadband providers by address. That level of transparency of data is unprecedented and allows for necessary verifiability of the network.²⁰ Based on this transparency, CN promotes mechanisms to ensure

¹⁷Prepared Testimony of Connected Nation Chairman and CEO Brian R. Mefford, United States House of Representatives Committee on Energy and Commerce, Subcommittee on Communications, Technology, and the Internet, "Oversight of the American Recovery and Reinvestment Act," April 2, 2009.

¹⁸See transcripts of Broadband TOPs Public Meeting: Roundtable on Broadband Mapping, NTIA, March 23rd, 2009

¹⁹For more information about our state mapping programs see Comments of ConnectKentucky, Filed at NTIA, April 13th, 2009; Comments of Connected Tennessee, Filed at NTIA, April 13th 2009; Comments of Connect Ohio, Filed at NTIA, April 13th, 2009.

²⁰See Connected Nation's interactive broadband inventory online maps to identify providers service a particular household or business: http://69.94.234.228/broadband_landscape/; http://connectoh.org/mapping_and_research/interactive_map.php; http://www.connectedtn.org/broadband_landscape/; and http://connectwestvirginia.org/mapping_and_research/interactive_map.php; and <http://connectmn.org/mapping/>

accuracy of the maps, including telephone hotlines and online feedback forms to allow input regarding data accuracy. All feedback is evaluated and mistakes are corrected immediately.

- Most importantly, this online transparency accomplishes an important goal that should not be dismissed. Connected Nation's maps are designed to inform the general public as well as public policy makers about broadband availability, but—most importantly—they are designed to help community leaders work together with broadband providers to fill the broadband gaps in their community.

For all of these reasons, Connected Nation believes that household level broadband inventory mapping generated in a collaborative partnership with providers is the most effective and expedient way of producing this important, tactical policy tool. Connected Nation's opinion is shared by other entities and organizations. In the Broadband Data Improvement Act and the ARRA, Congress unanimously sought to expand these collaborative mapping programs across states. Officials from an increasing number of states are putting their trust in Connected Nation and now have or will soon have granular, verifiable, continuously updated, online information about where broadband exists and where it does not across their state. Perhaps stakeholders should listen to officials in these states as to why they believe in these maps, such as the comments filed in this docket by the Minnesota Department of Commerce regarding Connected Nation's mapping program.²¹

The list of Connected Nation's accomplishments is long and continuously growing. No organization is perfect, particularly when acting as a coordinating entity between multiple public and private sector stakeholders, but Connected Nation is committed to its goal of helping empower more Americans with the tools that broadband enables. The Connected Nation model embraces President Obama's and Congress's spirit of constructive cooperation framed in the Broadband Data Improvement Act and in the ARRA. In that spirit, we urge Public Knowledge to embrace the constructive, collaborative model for public policy discourse instead of investing in efforts to smear an effective non-profit model for promoting digital inclusion across America.

Respectfully,



Brian Mefford
CEO Connected Nation, Inc.

²¹<http://www.ntia.doc.gov/broadbandgrants/comments/790C.pdf>

APPENDIX:

Selected testimonials in support of Connected Nation

PHIL BREDESEN
THE GOVERNOR OF TENNESSEE

13 April 2009

Ms. Anna Gomez
Deputy Assistant Secretary
U.S. Department of Commerce
National Telecommunications and Information Administration
Herbert C. Hoover Building (HCHB)
U.S. Department of Commerce / NTIA
1401 Constitution Avenue, N.W.
Washington, D.C. 20230

Dear Secretary Gomez:

Connected Tennessee has been active in the State of Tennessee since 2006 working to bring broadband availability to all Tennesseans and using innovative techniques to ensure that more and more citizens of the Volunteer State every day realize the benefits of broadband adoption.

Pursuant to P.L. 110-385, the Broadband Data Improvement Act (Section 106, subsection (i)(2)(B)), the State of Tennessee hereby designates Connected Tennessee as the single eligible entity in Tennessee to receive a grant under the State Broadband Data & Development Grant Program.

This is also to express Tennessee's strong support for full funding of the State Broadband Data and Development Grant Program, which was created in Sec. 106 of P.L. 110-385, the Broadband Data Improvement Act, and to which the NTIA can apply up to \$350 million from funding allocated in P.L. 111-5, the American Recovery and Reinvestment Act.

The State Broadband Data and Development Grant Program was based on a concept of statewide broadband initiatives that Tennessee has adopted, funded and initiated. The comprehensive approach to broadband advancement taken by Tennessee has yielded measurable and positive results for our citizens.

Since the start of our initiative, we have seen concrete and positive benefits, including home broadband adoption growth of 26% compared to an estimated 15% growth nationally. Computer ownership in Tennessee has more than doubled the national growth – increasing by 7%

compared to an estimated 3% nationally. Tennessee has now surpassed (by 10 percentage points) the national average of 74% of Americans who use the Internet from home location. In Tennessee, 84% of residents use the Internet. Underserved populations in Tennessee have seen the largest increases in broadband adoption and computer ownership, particularly among those demographics which have been targeted through the Connected Tennessee program. Broadband adoption among low-income minorities grew by 90% within the first year of Connected Tennessee's work.

Connected Tennessee's broadband initiative already has in place the activities required under the State Broadband Data and Development Grant Program to qualify for grant funds. Granular statewide broadband inventory maps, local grassroots demand creation teams, regular and local consumer research, collaboration with broadband service providers to extend broadband service to the unserved and programs to improve computer ownership are all elements of Connected Tennessee.

Furthermore, Connected Tennessee's research and mapping capabilities will be critical to Tennessee as we engage them to develop plans to promote broadband adoption and to bring new levels of service and affordability to our businesses and residences.

While Tennessee began this important work using state funds, our state needs federal help to continue and finish the work we have started. Congress unanimously passed the Broadband Data Improvement Act and created the State Broadband Data and Development Grant Program, deliberately providing \$350 million in the American Recovery and Reinvestment Act so that NTIA would have full funding for this important program. It is an indispensable part of a comprehensive federal approach to broadband improvement.

It is imperative for P.L. 110-385 to be implemented as rapidly as P.L. 111-5 which will make funding available expediently to states, including the Volunteer State, through the State Broadband Data and Development Grant Program.

Please contact Mr. John Morgan, Deputy to the Governor, at 615-253-7700, with any questions.

Sincerely,



Phil Bredesen



TED STRICKLAND
GOVERNOR
STATE OF OHIO

August 22, 2008

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

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

Dear Chairman Martin:

The State of Ohio recently embarked upon an initiative to expand broadband and improve technology adoption. This initiative, Connect Ohio, is a public-private partnership made up of the State, broadband service providers, regional technology groups, economic development organizations, and local leaders in every Ohio county.

In June, Connect Ohio publicly released its initial statewide broadband inventory map, along with data on computer and Internet use and findings regarding barriers to use. Local leaders in all 88 Ohio counties will use this broadband map, in concert with the extensive consumer data, to develop and integrate strategic technology plans to fill Ohio's broadband gaps, improve technology literacy, and bridge the digital divide.

We are also distributing new computers to low-income children through the No Child Left Offline program. Private sector donors continue to step up and support this important effort.

I understand that the Federal Communications Commission is considering its role in the process of mapping broadband infrastructure. I welcome this initiative, because I know we share the common goal of bringing critical broadband infrastructure to every one of our citizens. And, in your consideration, I urge you to work with, facilitate, and encourage public-private partnerships like Connect Ohio. These programs are taking hold and proving to be an effective method of achieving the goal of ubiquitous broadband that we share.

Connect Ohio's state-based broadband maps are critical to the program's success. The accuracy and usefulness of these maps depend upon our ability to work with broadband providers, community leaders, and consumers through a collaborative process whereby we help each other build, verify, and update the maps. A federal program that works with and supports state-based broadband mapping through public-private partnerships would be a solutions-oriented approach to national broadband mapping.

Page 2
Chairman Martin
August 22, 2008

I am encouraged by proposed Congressional legislation to enable and extend resources for public-private partnerships in every state. It is my hope that the Federal Communications Commission will unite in this effort to enable state-based, grassroots-driven broadband mapping and technology expansion for all Americans.

Sincerely,

A handwritten signature in black ink that reads "Ted Strickland". The signature is written in a cursive, flowing style.

Ted Strickland
Governor

cc:

Commissioner Michael J. Copps
Commissioner Jonathan S. Adelstein
Commissioner Deborah Taylor Tate
Commissioner Robert M. McDowell
Marlene Dortch, Secretary

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.

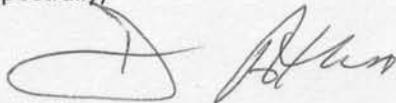
To begin with, the broadband provider which was identified by ConnectKentucky to best serve Monterey is *not* an incumbent telephone company, but is a competitive local exchange carrier, Southeast Telephone, which works to serve Kentucky's rural areas. This company is just one of the many small, local 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



Commonwealth of Kentucky

Magistrates

Alan Whaley

Bobby Fogle

Henry W. Bertram

Pendleton County Judge/Executive

233 Main St. Room 4

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www.pendletoncounty.ky.gov

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

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

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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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

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July 25, 2008

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

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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.

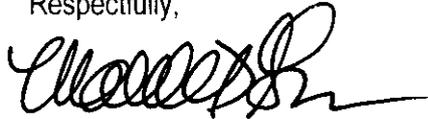
The rest of the story comes with how this dynamic and evolving broadband map is actually used and continually updated in Kentucky's communities. Local leaders across the state work hand-in-hand with ConnectKentucky technicians in the field to develop local teams for actionable technology growth across 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