

DEPARTMENT OF COMMERCE

National Telecommunications and Information Administration

DEPARTMENT OF AGRICULTURE

Rural Utilities Service

Joint request for information: American Recovery and Reinvestment Act of 2009 Broadband Initiatives	Docket No. 090309298-9299-01
--	-------------------------------------

**COMMENTS OF THE BENTON FOUNDATION
ON GRANT CRITERIA**

SUMMARY

The funds allocated by Congress for the NTIA BTOP program represent, on the one hand, only a down payment on building a national broadband system that will carry our nation into the 21st Century. At the same time, as the first step by the federal government in funding construction of broadband infrastructure, this program will set the pattern for policies that follow. This requires bold, transformative thinking that lays a framework for providing to all Americans the benefits of broadband.

Benton proposes the following principles to guide the grant criteria:

- Consistent with the Communications Act and the ARRA, the eligibility criteria should focus on projects that provide meaningful access to all Americans, with an emphasis on projects that will create not merely jobs in the short term, but enhanced economic opportunity in the long term. This means ensuring that programs that provide outreach and training to traditionally underserved communities should be eligible for funding.
- The NTIA should favor multi-purpose projects, and set eligibility criteria to favor projects with multiple purposes and components.
- Emphasis should be placed on ensuring affordability, uptake, expanding educational and health opportunities for indigent communities.
- NTIA should push for development of faster connections, consistent with improving the overall quality of broadband for everyone. Thus, while NTIA

should prioritize increasing speed, it must weigh speed as only one factor in the mix.

- NTIA should coordinate with RUS to maximize effectiveness of every dollar spent. In particular, where RUS funds construction of physical infrastructure, NTIA should consider how to supplement these projects with targeted education and outreach programs to enhance adoption and utility for users.
- NTIA should recognize the critical role public computing plays as both a safety net for underserved populations and as a gateway for adoption by introducing broadband access via trusted community institutions.
- Any additional criteria should be research-based.

With regard to this last criteria, Benton is pleased to highlight the work of University of Illinois Assistant Professor Kate Williams. Professor Williams has done research into previous successful programs under the original Technologies Opportunity Program (TOP). Her research demonstrates that situating projects in communities, providing locals with needed training to maintain the projects, and encouraging local “ownership” all enhance adoption, sustainability, and long-term success.

TABLE OF CONTENTS

I.	Introduction	5
II.	NTIA Must Adhere to the Overarching Purposes of U.S. Telecommunications Law	6
III.	NTIA Must Adhere to Purposes of the Recovery Act	7
IV.	NTIA Must Not Read BTOP Purposes Too Narrowly	8
V.	NTIA Must Give Priority to Multi-Purpose Projects	9
VI.	Criteria for Infrastructure Deployment: Affordability, Subscribership, Speed, Health, Education, Children	10
	A) NTIA Must Include Affordability and Subscribership Goals	10
	B) Congressional Intent is Clear on the Need for Speed	12
	C) Coordinating Buildout Grants with RUS	13
	D) Finding the right mix of tools	14
	E) Non-Statutory Criteria Should be Research-Based	15
VII.	Criteria for Technology Opportunities Grants	16
	A) Sustainable Adoption of Broadband	16
	B) Public Computing Grant Criteria	16
	1. Identify Who Uses Public Computing	17
	2. Support for Libraries	19
	3. Past the Statute, NTIA Must Use Only Research-Based Criteria	20
VIII.	Conclusion	20

I. Introduction

Section 6001 of the American Recovery and Reinvestment Act of 2009 (Recovery Act) requires the National Telecommunications and Information Administration (NTIA) to establish the Broadband Technology Opportunities Program (BTOP) and the Rural Utilities Service (RUS) to make grants and loans for the deployment and construction of broadband systems. The Recovery Act also makes \$7.2 billion available for these programs. Pursuant to the Joint Request for Information and Notice of Public Meeting¹ released by the NTIA and the Rural Utilities Service (RUS) on March 10th 2009 and to coordinate and facilitate the development of these programs in a timely manner, the Benton Foundation² addresses questions regarding grant criteria³ in the comments below.

The Recovery Act establishes several considerations for awarding BTOP grants. Past these statutory considerations, NTIA may consider other priorities in selecting competitive grants.

¹ Joint Request for Information and Notice of Public Meetings, 47 Fed. Reg. 10717. Mar 12, 2009. (“Joint Request”).

² The mission of the Benton Foundation is to articulate a public interest vision for the digital age and to demonstrate the value of communications for solving social problems. Benton is a longtime supporter of research on universal service and the potential of high-speed Internet connections for improving Americans’ lives.

³ See Joint Request questions Nos. 4, 6, and 7.

II. NTIA Must Adhere to the Overarching Purposes of U.S.

Telecommunications Law

NTIA should not steer far from the historic, overarching purpose of U.S.

telecommunications law (and reinforced by the goals of this section of the Recovery Act)

-- to make available to all people of the United States a rapid, efficient, Nation-wide and world-wide wire and radio communications service with adequate facilities at reasonable

charges.⁴ Parsing this out, it means ALL people in ALL areas of the U.S.; it means fast

and efficient; connected to the entire world; wire and wireless; and affordable. The

principle of universal, affordable service, including advanced services, was reaffirmed in

Sec 254(b)(2) of the Communications Act⁵ and Sec 706 of the Telecommunications Act

of 1996.⁶ Sec 254(b)(2) calls for advanced services to be provided in all regions of the

nation. In section 706(a) of the Telecommunications Act of 1996, Congress charged

policymakers with “encourage[ing] the deployment on a reasonable and timely basis of

advanced telecommunications capability” – broadband – “to all Americans.”⁷ Nor can

NTIA ignore the Sec 257 Communications Act which instructed federal

telecommunications policy to favor "diversity of media voices, vigorous economic

competition, technological advancement, and promotion of the public interest,

convenience, and necessity.”⁸

⁴ 47 U.S.C. 151. Communications Act of 1934, as amended Sec 1. (“Communications Act”)

⁵ 47 U.S.C. 254

⁶ 47. U.S.C. 157. Telecommunications Act of 1996. Sec 706 explicitly defines advanced telecommunications capability as broadband.

⁷ 47 U.S.C. § 157 nt. (incorporating section 706 of the Telecommunications Act of 1996, Pub. Law No. 104-104, 110 Stat. 56 (1996)).

⁸ 47 U.S.C. 257.

Some have asked NTIA to focus *solely* or *mainly* on bringing broadband service to areas unserved or unserved before, but calls to "focus on the unserved" are too narrow a reading of the statute and should in no way deter investment that could foster competition (a means to efficiency) or addressing the technology opportunities aspects of the Recovery Act. To couple broadband access with broadband use, the need for fiber networks and WiMax towers cannot crowd out the needs for computers, training, and outreach.

III. NTIA Must Adhere to Purposes of the Recovery Act

The NTIA must also adhere to the overall purposes of the Recovery Act. Therefore, application criteria should include:

- the number of U.S. jobs the project will create or preserve,
- the positive effect on the people most impacted by the recession, including those who have lost homes, jobs, and/or savings,
- projected technological advances in science and health,
- the long-term economic benefits of the project ,
- relief for the state and local government budgets.⁹

NTIA should favor no one Recovery Act purpose over the others. Priority should be given to projects that address multiple Recovery Act purposes.

⁹ Recovery Act Sec 3(a)

IV. NTIA Must Not Read BTOP Purposes Too Narrowly

Sec 6001(b) of the Recovery Act states that the purposes of the program are to—

1. provide access to broadband service to consumers residing in unserved areas of the United States;
2. provide improved access to broadband service to consumers residing in underserved areas of the United States;
3. provide broadband education, awareness, training, access, equipment, and support to—

(A) schools, libraries, medical and healthcare providers, community colleges, and other institutions of higher education, and other community support organizations and entities to facilitate greater use of broadband service by or through these organizations;

(B) organizations and agencies that provide outreach, access, equipment, and support services to facilitate greater use of broadband service by low-income, unemployed, aged, and otherwise vulnerable populations; and

(C) job-creating strategic facilities located within a State-designated economic zone, Economic Development District designated by the Department of Commerce, Renewal Community or Empowerment Zone designated by the Department of Housing and Urban Development, or Enterprise Community designated by the Department of Agriculture;

4. improve access to, and use of broadband service by public safety agencies; and
5. stimulate the demand for broadband, economic growth, and job creation.

In Joint NTIA/RUS meetings, some commenters have suggested NTIA focus grants on projects to extend broadband infrastructure to unserved areas. These proposals are inconsistent with the Recovery Act, ignoring BTOP purposes 2-5.

V. NTIA Must Give Priority to Multi-Purpose Projects

NTIA should look to support projects that aim to engage all five of BTOP's purposes, address the broader purposes of Recovery Act, and leverage other Federal broadband investments made by the Recovery Act and through existing programs. The statute is clear that NTIA must “ensure that the program complements and enhances and does not conflict with other Federal broadband initiatives and programs.”¹⁰ NTIA must coordinate with not only RUS and the FCC, but the Department of Energy, the Department of Health and Human Services, and the Department of Education, at a minimum, to see how to best leverage all the broadband-related investments included in the Recovery Act.

This does not mean NTIA should only give consideration to grants that serve all these purposes. But it should prioritize such requests. This prioritization will give a leg up to infrastructure projects that partner with technology opportunities groups, have a strong digital inclusion element and/or leverage other recovery Act investments. This prioritization would also help bring home to applicants the broader, critical point: the value of broadband comes from how it improves people's lives.

¹⁰ Recovery Act Sec 6001(a).

VI. Criteria for Infrastructure Deployment: Affordability, Subscribership, Speed, Health, Education, Children

The Recovery Act offers *explicit criteria for applications that aim to deploy infrastructure*. NTIA is to consider if a infrastructure buildout project:

- (A) will, if approved, increase the affordability of, and subscribership to, service to the greatest population of users in the area;
- (B) will, if approved, provide the greatest broadband speed possible to the greatest population of users in the area;
- (C) will, if approved, enhance service for health care delivery, education, or children to the greatest population of users in the area; and
- (D) will, if approved, not result in unjust enrichment as a result of support for non-recurring costs through another Federal program for service in the area.¹¹

A) NTIA Must Include Affordability and Subscribership Goals

NTIA asks what role, if any, should retail price play in the grant program. It must weigh heavily; Sec 6001(h)(2)(A) mandates that NTIA include affordability and subscribership in grant criteria. The Recovery Act follows 75 years of telecommunications policy in identifying affordability as a concern. Anyone submitting grants to provide service should include pricing information.

¹¹ Sec 6001(h)(2).

Quantitative measures of the relative concept of affordability involve estimating the percentage of income that households might be forced to spend for service at various income levels and rate levels (see the Consumer Expenditure Survey compiled by the Bureau of Labor Statistics).¹² Qualitative measures include what people consider "too expensive" or "too much" to pay for service. Examples of this measurement are levels of satisfaction and dissatisfaction with rates expressed in response to questions asked in opinion polls.¹³

Looking at telephone service, Mark Cooper has offered a rule of thumb for affordability, measured as penetration and burden.¹⁴ He found that at high levels of income, approximately 99 percent of all households have telephone service. So, it is reasonable to assume that if the cost of service were not a burden, 99 percent of all households would have service.¹⁵ Cooper also found that penetration rates of 99 percent are consistently achieved only when the cost of telephone falls to less than 1 percent of income -- to about .7 percent. Thus .7 percent of income would seem to be a target level for cost, if universal service is to be achieved.

¹² Susan E. McMaster and James Lande, Reference Book: Rates, Price Indexes, and Household Expenditures for Telephone Service (Industry Analysis Division, Common Carrier Bureau, Federal Communications Commission, November 1995).

¹³ "Direct Testimony of Dr. Mark N. Cooper on Behalf of the American Association of Retired Persons," Comprehensive Review of the Revenue Requirement and Rate Stabilization Plan of Southern Bell Telephone and Telegraph Company, Florida Public Service Commission, Docket No. 900960-TL, November 2, 1992.

¹⁴ Cooper, Mark. Universal Service: A Historical Perspective and Policies for the 21st Century. Benton Foundation and the Consumer Federation of America. (See chapter 3 "Affordability: Explicit statements of complex goals") <http://benton.org/publibrary/uniserv-prospective/prospects.html>

¹⁵ "High" levels of income in this case start at \$35,000--very firmly in the middle class.

If the goal of BTOP projects is more than just access, if a measure of broadband use is also a criteria, as Sec 6001(h)(2)(A) seems to be, applicants should show what percent of incomes the cost of service will be in the area served and project subscribership on those percentages. The applicant then should include information for how service will be provided for the people in households where cost of service exceeds .7 percent to 1 percent of annual income.

B) Congressional Intent is Clear on the Need for Speed

Sec 6001(h)(2)(B) stresses the importance Congress puts on the speeds broadband delivered to people over new broadband networks. For all NTIA–supported buildout projects, the Conferees instruct the NTIA to seek to fund, to the extent practicable, projects that provide the highest possible, *next-generation broadband* speeds to consumers.¹⁶ The Federal Communications Commission collects broadband data in tiers.¹⁷ At a minimum, then, the speeds delivered by infrastructure deployment should exceed the FCC’s “basic broadband” equal to or greater than 768 kbps but less than 1.5 mbps. However, the California Broadband Taskforce¹⁸ determined that even the networks delivering FCC’s broadband tier 4 may not be compatible for the broadband-related

¹⁶ Conference Report to Accompany H.R. 1 February 12, 2009. Page 775. [emphasis added]

¹⁷ In the Matter of Development of Nationwide Broadband Data to Evaluate Reasonable and Timely Deployment of Advanced Services to All Americans, Improvement of Wireless Broadband Subscribership Data, and Development of Data on Interconnected Voice over Internet Protocol (VoIP) Subscribership. (WC Docket No. 07-38). Report and Order adopted March 19, 2008. ¶20. 1) greater than 200 kbps but less than 768 kbps is defined as “first generation data;” 2) equal to or greater than 768 kbps but less than 1.5 mbps is defined as “basic broadband tier 1;” 3) equal to or greater than 1.5 mbps but less than 3.0 mbps is defined as “broadband tier 2;” 4) equal to or greater than 3.0 mbps but less than 6.0 mbps is defined as “broadband tier 3;” 5) equal to or greater than 6.0 mbps but less than 10.0 mbps is defined as “broadband tier 4;” 6) equal to or greater than 10.0 mbps but less than 25.0 mbps is defined as “broadband tier 5;” 7) equal to or greater than 25.0 mbps but less than 100.0 mbps is defined as “broadband tier 6;” and 8) equal to or greater than 100 mbps is defined as “broadband tier 7.”

¹⁸ California Broadband Taskforce, January 2008. See http://www.calink.ca.gov/pdf/CBTF_FINAL_Report.pdf

applications envisioned in the Recovery Act. The California Broadband Taskforce found that upstream and downstream speeds of 10Mbps-100Mbps are required for telemedicine, educational services, telecommuting, smart/intelligent building control and other applications. Moreover, the Information Technology and Innovation Foundation predicts that:

Within the next decade, 2160P 'QuadHDTV' will come onto the market, driving demand for bandwidth consumption up to 64Mbps for good-quality 2160P. On the technology frontier lies ultra high-definition video (UltraHD), which Japan is currently experimenting with. UltraHD video, operating at 7680x4320 resolution and requiring 256Mbps, will bring cinematic quality video to wall-sized video displays, and will eventually become as common and affordable as the 1080P HDTV sets of today. UltraHD television and video will require substantial amounts of bandwidth and become a leading consumer of broadband going forward.¹⁹

When considering infrastructure deployment, NTIA must balance Sec 6001(h)(2)(A) and Sec 6001(h)(2)(B) – that is, a balance between universality and affordability with speed and efficiency of the network. But when comparing two applications that propose to serve the same area or similar areas with equal populations and prices, the faster service provided should be favored.

C) Coordinating Buildout Grants with RUS

Keeping in mind there are five BTOP purposes, underserved and unserved cannot be made to be the dominant criteria, except in the broadest sense. However, when considering just projects that address these areas, the Department of Agriculture's Rural

¹⁹ Atkinson, Rob; Stephen Ezell; Daniel Castro; and George Ou. The Need for Speed: The Importance of Next-Generation Broadband Networks. Information Technology and Innovation Foundation. March 5, 2009

Utilities Service has its own specific goals, which are more focused on construction and, obviously, rural areas.²⁰

NTIA should adopt a similar, elastic definition of underserved in non-rural areas: *any area which does not have sufficient access to high speed broadband service to facilitate economic development.* This would allow the NTIA to address the diverse needs of communities -- boosting relatively low speeds in some areas, while other areas would have the opportunity to build networks with speeds equivalent to those in Europe and Asia.

To properly coordinate awards in rural areas, applications for purely rural builds should be directed to the RUS while BTOP grants should support RUS recipient partners who address the technology opportunities aspects of an overall project.

D) Finding the right mix of tools

NTIA asks if it should consider the fact that different technologies can provide different service characteristics, such as speed and use of dedicated or shared links, while promoting technological neutrality (that is, not favoring one technology over another in the grant program). Benton does not see a tension here. Technology matters and tools matter. The goal should be to fit the right tool to the necessary job. That must inevitably consider whether the proposed technology is rational and fits with the proposed project.

²⁰ Specifically, the Secretary of Agriculture is to determine and direct grants, loans and/or loan guarantees to areas where "at least 75 percent of the area to be served by a project receiving funds ... shall be in a rural area without sufficient access to high speed broadband service to facilitate rural economic development." Recovery Act "Distance Learning, telemedicine, and Broadband Program" Division A, Title I.

E) Non-Statutory Criteria Should be Research-Based

NTIA has a number of statutory criteria to consider as mentioned above. Therefore, if it is to adopt any additional criteria, NTIA should do so only if research on successful broadband projects demonstrates an additional need and the criteria matches the conclusions of the research.

Example: Local Community Leadership

A 2006 Government Accountability Office (GAO) report²¹ found that local community leadership plays a significant role in broadband deployment. One of the ways that some communities have addressed the lack of market entry into rural areas has been through initiatives wherein community leaders have worked to enhance the likely market success of private providers' entry into rural broadband markets. For example, some community leaders have worked to aggregate demand—that is, to coordinate the Internet needs of various users so that a potential entrant would be able to support a business plan. GAO was told that this leadership—sometimes by key government officials, sometimes through partnerships—was seen as critical in helping to spur the market in some unserved areas.²² Therefore, NTIA should include criteria that demonstrates strong local leadership supports a broadband project.

²¹ Telecommunications: broadband Deployment is Extensive throughout the United States, but It Is Difficult to Assess the extent of Deployment Gaps in Rural Areas. GAO-06-426 (Washington, D.C.: May 5, 2006) (<http://www.gao.gov/new.items/d06426.pdf>)

²² *Telecommunications: Challenges to Assessing and Improving Telecommunications for Native Americans on Tribal Lands*, GAO-06-189 (Washington, D.C.: Jan. 11, 2006) (<http://www.gao.gov/new.items/d06189.pdf>) discusses how leadership in a community can help to improve telecommunications services on tribal lands. The report provides several examples of tribes addressing the barriers to deployment of telecommunications networks by partnering with private entities, providing technical training, and taking initiative to access federal grants.

VII. Criteria for Technology Opportunities Grants

A) Sustainable Adoption of Broadband

The Recovery Act directs that not less than \$250,000,000 of the BTOP shall be awarded for grants for innovative programs to encourage sustainable adoption of broadband services.

The NTIA asks what factors should be given priority in determining whether proposals will encourage sustainable adoption of broadband service. People tend to adopt the tools and services that can positively change their lives. Take as an example, Apple's iPhone. Although seen as a luxury item by many, the strongest growth in users is coming from those earning less than the median household income. Why? When the device is used in lieu of multiple digital devices and services -- wire and wireless phones, and Internet service -- one can actually realize cost savings. What must broadband deliver to be sustainable? Localism. People care about their homes and home towns, their children and their schools, their health and well being. Sustainable adoption will occur when people see how it makes their lives better.

B) Public Computing Grant Criteria

NTIA is to make at least \$200 million available for expanding public computer capacity including community colleges and public libraries. NTIA is asking what criteria will help

identify the best projects to award grants to. NTIA is also asking for public comment on what additional institutions other than community colleges and public libraries should be considered as eligible recipients under this program.

1. Identify Who Uses Public Computing

Even though broadband subscribership is growing in the U.S., there remain many pockets of people who cannot use high-speed Internet connections in their homes. A July 2008 report, *Home Broadband Adoption 2008*, by the Pew Internet and American Life Project (Pew), reported that 85 percent of U.S. households with incomes in excess of \$100,000 subscribed to broadband Internet access services; however, only 25 percent of U.S. households with incomes at or below \$20,000 subscribed to broadband services which was a decreased penetration rate for such households from 28 percent in March 2007 service. Pew found that the major reasons for not using broadband are availability, price, and lack of interest. Public access points are critical for addressing these challenges.

Public computer capacity is often provided through a community technology center (CTC) which offers public access to computers and the Internet. But CTCs go beyond hardware and connections; they address the skills and motivation needed for sustained use, empowering clients to improve their lives. CTCs provide training that ranges from basic computing skills to digital media production as well as applied skills (e.g. online job searching). While some CTCs are freestanding operations, many others are located in public libraries, schools, social service agencies, neighborhood centers, and religious centers.

In 2004, Pew found that 23% of adult U.S. Internet users (roughly 30 million people) have gone online from a place other than home or work. Those who depend on "third places" make up only 3% of the entire U.S. Internet population, but they are disproportionately likely to live in households earning less than \$30,000, to live in rural areas, and to be newcomers to the online world. They are fairly infrequent users of the Internet who often use libraries and friends' homes as their access points, but they have entered the online world at the level that is available to them.

Among all away-from-home, away-from-work users, the top "other" locations for Internet access are school (27%), friend/neighbor's house (26%), at a library (26%), and a relative's house (9%). Pew found that 28% of Internet users with annual household incomes of less than \$30,000 have logged on from a location other than their home or place or work. 50% of all Internet users who use at "third place" have income below \$50k. School (31%), libraries (30%), and friends'/neighbors' houses (26%) are the top "other" locations identified by this group. On a typical day, 71% of those from low-income homes accessing the Internet from a "third place" do so at a school, with a library and a friend's/neighbor's house each accounting for 12% of other location usage. In addition, nearly one-quarter of both Hispanics and Blacks accessed Internet from 3rd place.

2. Support for Libraries

It is no surprise that libraries are explicitly highlighted in the Recovery Act because they, like community colleges, are centered in the community and provide training and not just access. The Institute of Museum and Library Services reports that the technology available in today's public libraries can help reduce the broadband access gap for families, while providing a wide range of information resources and services. Overall, the percentage of public libraries that provide free broadband Internet to patrons increased from 49% in 2002 to 65% in 2007, the most recent year available. In 2007, the percentage of libraries providing broadband Internet access in urban, suburban and rural areas was 91, 70 and 52%, respectively. Investments in library technology are helping communities that need it most. In 2007, 88% of public libraries in high poverty areas provided access to broadband Internet and 73% of public libraries reported their facilities as being the only source of free Internet access in their community.

Supporting public computing capacity at libraries and community colleges should allow these local community institutions to expand their missions to include community broadband safety net -- both access point and trainer. They are well-placed to facilitate access to broadband envisioned in the recovery Act for low-income, unemployed, aged, and otherwise vulnerable populations in order to provide educational and employment opportunities.

3. Past the Statute, NTIA Must Use Only Research-Based Criteria

As to the organizations to target for these awards, in 2003 Kate Williams published research estimating that there were 85,000 to 144,000 community technology centers in the US. These include but are not limited to: public libraries; Internet cafés; telecenters (community technology centers); Senior centers; copy shops; day care centers; churches; community centers; laundromats; hospitals; apartment complexes; museums; and, government offices.

NTIA should also do outreach to and prioritize applicants that already are well-placed to reach the most-needy members of a community. Local schools, already offering Internet access to students, could be seen as possible centers for access for parents and other members of the community. In addition, many non-profits provide services to low-income and unemployed persons and could augment their services with public computing and broadband access. Benton suggests that, in particular, NTIA do outreach to Community Media and Technology Centers; Public, Education, and Government (PEG) access centers; and members of the National Association of Media Arts Centers.

Conclusion

For the above reasons, Benton urges NTIA to adopt eligibility criteria based on overarching U.S. telecommunications law that are consistent with the purposes of the Recovery Act and backed by research findings. The funds allocated by Congress for the NTIA BTOP program represent, on the one hand, only a down payment on building a

national broadband system that will carry our nation into the 21st Century. At the same time, as the first step by the federal government in funding construction of broadband infrastructure, this program will set the pattern for policies that follow. This requires bold, transformative thinking that lays a framework for providing to all Americans the benefits of broadband.

Respectfully submitted,

By: /s/ Charles Benton, Chair

Charles Benton
Chairman and CEO
BENTON FOUNDATION
1625 K Street, NW 11th Floor
Washington, DC 20006
847.328.3040
cbenton@benton.org

April 1, 2009