

April 1, 2009

U.S. Department of Commerce
1401 Constitution Ave., NW
Washington, DC 20230

Submitted electronically at: <http://www.ntia.doc.gov/broadbandgrants/form.cfm>

Dear Department of Commerce:

The Washington Public Utility Districts Association (WPUDA) has been carefully monitoring the Broadband Technology Opportunities Program (BTOP) public meetings that are being facilitated by the U.S. Department of Commerce. We would offer the following comments and hope they will be used to help shape America's broadband future.

Broadband

Broadband speeds should be considered when evaluating grant proposals. Make an investment in the future of America by spending taxpayer dollars on 21st century technology. WPUDA members have been providing 100 Mbps symmetrical speeds for over ten (10) years in rural areas of Washington State and we support fixed line speeds in excess of 10 Mbps. You must set high standards if you want to make a difference.

Unserved and Underserved

Bringing high quality, affordable broadband to underserved and rural populations is essential. Public agencies have historically filled the void when utility services are poor quality, unaffordable or not available. Our members have expert knowledge about where to most efficiently use BTOP funds to benefit unserved and underserved populations.

Consumer Choice, Competition and Accessibility

Consumers stand to gain the most from greater competition in the marketplace. Fair and open competition means lower price, more choice and better service. Competition should not be discouraged; it is the critical driver of economic performance and innovation. Local utility providers, public or private, should be allowed to compete for BTOP grant funds based on fair and open criteria that include: potential for job creation, timeliness, sustainability, cost, and

interoperability. If government funds are used for construction, networks should be required to follow open access principles.

WPUDA members intend to seek BTOP grant and loan funds to provide the greatest broadband speeds to the citizens in Washington State. We look forward to working with you to shape America's broadband future.

Sincerely,



Steve Johnson
Executive Director