

**Before the:**

**Department of Commerce,  
National Telecommunications and Information Administration**

**And**

**Department of Agriculture,  
Rural Utilities Service**

**Washington, D.C. 20230**

**Docket No. 090309298-9299-02**

**American Recovery and Reinvestment Act of 2009 Broadband Initiatives**

**Response of Request for Information**

**By**

**International Broadband Electric Communications, Inc.**

## **Introduction**

International Broadband Electric Communications, Inc. (IBEC) is a full service Internet Service Provider with 14 years experience providing Internet access with dial-up, Wireless, DSL, and Broadband over Power line (BPL). IBEC currently has contracts with 16 electric cooperatives (co-ops) to deploy its BPL solution throughout their entire network reaching over 325,000 customers.

Our relationships with rural co-ops, our deployment relationship with IBM and our patented technology enables us to deploy our network cost effectively and quickly in markets that have largely been ignored. In addition, our patented technology has been approved by the FCC. To date we are the only BPL provider to have been approved for funding by the Department of Agriculture Rural Utilities Service. BPL not only has the ability to provide Rural America with Broadband Service, but also provides the communication link necessary for a real smart grid solution.

As a current broadband provider in Rural America, IBEC appreciates the opportunity to submit comments to the Department of Commerce, National Telecommunications and Information Administration (NTIA) and the Department of Agriculture, Rural Utilities Service (RUS).

The American Recovery and Reinvestment Act of 2009 Broadband Initiatives gives NTIA and RUS the unique opportunity to really invest in unserved and underserved areas and communities. We believe these areas and communities are primarily found where a low density of homes per mile exists. These are your last mile customers that have largely been left out, thus creating what many refer to as the Digital Divide. The generous amount of funding provides Rural America with the opportunity to not only survive, but compete in today's world.

NTIA and RUS have the unique opportunity to work with the FCC in setting standards and laying the ground rules so rural and unserved communities have the opportunity to utilize broadband service. The large sum of money, short deadline, agency coordination, and lofty goals make this task challenging, but not impossible. Again, IBEC welcomes the opportunity to contribute to this daunting yet fruitful task.

## Recommendations

- 1.) **Cohesive Definitions:** It is imperative RUS, NTIA, and the FCC establish definitions jointly regarding ARRA funds used for the deployment of Broadband. Given the time constraints placed on awarding the funding, these agencies will need to work together to accomplish this monumental task. This will also allow clear and concise guidelines for applicants as well as for the regulating bodies.
- 2.) **Definition of Broadband:** To ensure those typically left behind in the digital divide receive quality Broadband, a minimum threshold for speed should be set at 1.54 mbps symmetrically. This is a T-1 speed and has consistently been thought of as Broadband. Entities making application for stimulus funding must offer and have the ability to deliver 1.54mbps symmetric service to any consumer that requests that speed. Setting a minimum speed does not prohibit providers from offering lower speeds or even prevent customers from selecting a slower speed, but offers residents and businesses the opportunity to partake in high speed quality service. In addition, by setting a minimum speed, it enables applicants and federal agencies to determine unserved and underserved communities.
- 3.) **Definitions of unserved community/area:** A community/area that does not have a broadband service provider offering 1.54 mbps symmetrically to both residents and businesses. Allow providers utilizing ARRA funds to offer quality service to markets that have largely been ignored.
- 4.) **Definition of underserved community/area:** A community/area that has no more than 2 providers delivering 1.54 mbps of symmetrical speed to more than 30% of the service area. This would allow providers to use ARRA funds to fill in the gaps between the more densely populated communities.
- 5.) **ARRA funds be used in a way that is technology neutral:** This would recognize there is no one size fits all for rural, unserved, and underserved communities and allow for many options in bringing quality broadband service.
- 6.) **Projects receiving award priority:**
  - a. Projects serving unserved and underserved communities and areas should be given first priority. These parts of America are struggling to survive. Allowing these communities/areas priority would bring them advanced opportunities for economic growth, remote educational opportunities, safety, and health care benefits through the use of telemedicine.
  - b. Shovel ready project should also be given priority. These communities have waited long enough and time is of the essence.
  - c. Another consideration should be the viability of the project. If a project cannot survive beyond the period of the grant funding, it does not support real economic, education, safety, or health care growth. Projects that can support

themselves beyond the grant funding period provide the best stewardship of tax payer funding.

- d. In addition, projects that leverage other ARRA projects, such as Smart Grid, should be given priority. This allows for technology to continue to grow and support the Obama Administration's goals.

7.) **Organizations receiving award priority:**

- a. Organizations that currently provide broadband in rural, unserved, and underserved communities should receive priority.
- b. In addition, organizations that have demonstrated success under current RUS Broadband Programs should receive special consideration. They have the proven technological, managerial, and real life experience needed to make these projects a success.
- c. Finally, organizations that serve an entire area, not just the densely populated communities should get priority. They truly meet the mission of the ARRA Broadband Initiative in bringing service to those that have none.

We thank you for the opportunity to provide comments and feedback. IBEC is looking forward to completing the challenge and opportunity Congress has provided all of us.

Respectfully Submitted,

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Communications, Inc.**

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