



NATIONAL ASSOCIATION OF FARMER ELECTED COMMITTEES
AMERICAN AGRICULTURE MOVEMENT
AMERICAN CORN GROWERS ASSOCIATION
LEAGUE OF RURAL VOTERS
NATIONAL LATINO FARMERS & RANCHERS TRADE ASSOCIATION
WOMEN INVOLVED IN FARM ECONOMICS
NATIONAL FARMERS ORGANIZATION

April 13, 2009

Bernadette McGuire-Rivera
Associate Administrator, Office of Telecommunications and Information Applications
Broadband Technology Opportunities Program
U.S. Department of Commerce
Room 4812
1401 Constitution Avenue, NW
Washington, DC 20230

RE: Docket Number 090309298-9299-01

Dear Ms. McGuire-Rivera:

We believe that the Broadband Technology Opportunity Program (BTOP) and other stimulus funds can help connect millions of rural Americans to high-speed broadband Internet service if NTIA prioritizes unserved areas using the best data, employs careful oversight of grants, helps families avoid harmful content, increases broadband adoption through training and other efforts, and improves public safety.

The U.S. boasts the largest online population in the world, and yet in many low density rural areas, Americans lack access to broadband altogether or lack access to the same broadband speeds and choices as their urban and suburban counterparts. In addition, broadband adoption is low in these communities; a March 19, 2009 Congressional Research Service report indicates that only 38% of rural residents actually use broadband. This situation poses challenges for rural America that if not properly addressed will result in the loss of jobs, residents, and competitiveness in small towns. Rural Americans want and need access to broadband to attract and retain businesses, and to benefit from activities such as distance learning and telehealth, telecommuting, or developing and conducting business remotely.,

To ensure that BTOP funding is used to create broadband opportunities in Rural America, program guidelines should be drafted to do the following:

- A. *Prioritize Unserved Areas.* Building new broadband networks in areas that are completely unserved will bring tremendous immediate benefits – new construction, customer service and maintenance jobs; infrastructure to attract new businesses to rural areas; use of broadband to increase farm revenues and cut costs; opportunities for distance learning that will give students young and old a chance for a world-class education; and access to advanced health care treatments through telemedicine services. Given the limited BTOP funding available, delivering these benefits to unserved areas – those areas lacking a *single* terrestrial broadband provider – *must* be the top priority for stimulus funds.

- B. *Employ Careful Oversight.* We believe that where the private sector cannot serve rural America's demand for broadband, public funding – whether it be Universal Service Funds, funding for municipal networks where private networks fail to deliver, or USDA Rural Utilities Service (RUS) monies – can and should be used to fill in the gaps. However, it is critical that these funds are used judiciously, and that there be openness and transparency with respect to funding applications and careful oversight: due to lax accountability measures countless taxpayer-funded networks, both federal and local, have been built where existing broadband networks exist rather than in the unserved areas most in need. Rural America can ill afford to be further victimized by wasteful use of taxpayer dollars.
- C. *Protect Families from Harmful Content.* The Internet should be a welcoming place for families, yet many households who *can* access broadband choose not to out of a fear of objectionable content, particularly harmful items potentially accessed by children. NTIA can and should use its funds to promote broadband adoption in rural America by increasing digital literacy, particularly with respect to the technological tools available to parents to protect their children from inappropriate content, spam, fraud, and online predators.
- D. *Improve Public Safety Communications.* Rural America is particularly vulnerable to natural disasters and lack of access to emergency services. Years after the tragedies of September 11, 2001 and Hurricane Katrina, it is unimaginable that America continues to lack a reliable network for first responders. With universal satellite and other wireless services available today – and in particular those just over the horizon – there is no reason why ubiquitous, reliable emergency communications should not be available to our public safety officials and our citizens – often the actual “first responders” to a crisis. NTIA and RUS should support projects aimed toward using broadband technology to improve public safety communications.
- E. *Increase Broadband Demand and Adoption.* One of the best ways to incentivize investment is to demonstrate and improve consumer demand for broadband. Many rural Americans have access to broadband, but for the reasons noted above, do not subscribe. BTOP should direct substantial funds at increasing adoption, whether through digital literacy and education efforts, or through programs geared toward improving access to computers and broadband services for low-income households.
- F. *Collect and Use the Best Data.* The lack of detailed data about broadband availability and use is setting rural America back. Government agencies and innovative non-profits are developing broadband maps. NTIA and RUS should carefully examine this data to ensure that stimulus funds are properly targeted.

Thank you for your continued leadership on this important task.

Sincerely,



Cole Sims, National Spokesperson
Rural Telecommunications Alliance