



April 13, 2009

The Honorable Gary Locke
Secretary, U.S. Department of Commerce
1401 Constitution Ave, N.W.
Washington, D.C. 20230

The Honorable Tom Vilsack
Secretary, U.S. Department of Agriculture
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, D.C. 20250

The Honorable Anna Gomez
Acting Assistant Secretary, Deputy Assistant Secretary for Communications and Information Administration
U.S. Department of Commerce
1401 Constitution Ave, N.W.
Washington, D.C. 20230

RE: American Recovery and Reinvestment Act of 2009 (ARRA) Broadband Technology Opportunities Program

Dear Secretary Vilsack, Secretary Locke, and Assistant Secretary Gomez:

We represent a regional coalition (the "Coalition") of public entities from the Houston, Harris County region of Texas, whose sole purpose is to serve the public interest. The Coalition appreciates this opportunity to provide comment to the Department of Commerce National Telecommunications and Information Administration (NTIA) and the Department of Agriculture Rural Utility Service (RUS). Members of the Coalition have a vested interest in the deployment and accessibility of broadband services for all residents. Specifically we seek to ensure that the Broadband Technology Opportunities Program benefit the more than 400,000 residents living in underserved communities across our region.

We believe the following recommendations to be vitally important for consideration by the NTIA and the RUS in formulating the Broadband Technology Opportunities Program:

The Coalition recommends that the NITA and the RUS when considering the definition of “underserved area”, should factor the speed and capacity, usefulness, affordability, accessibility, and net neutrality of available Internet services. We believe that these factors will help to qualify projects that are focused on increasing broadband adoption in impoverished communities across the United States. Assisting these communities will further the purposes of the ARRA by using broadband funding to create jobs, promote economic recovery and to assist those most impacted by the recession.

The Coalition also recommends that the NTIA and the RUS when considering *affordability*, be consistent with other federal agencies’ use of the established poverty guidelines¹, such as the U.S. Department of Health and Human Services and any other expansion of eligibility criteria made possible under the ARRA.

The Coalition recommends that the NTIA and the RUS seek to maintain a nationally competitive process in its consideration of the role of State agencies in the grant selection process. We recommend that the grant process is not strictly an intra-state competition, so that the opportunity for nontraditional but effective ways of making broadband accessible to all underserved communities is realized.

The Coalition recommends the NTIA and the RUS consider that qualified institutions which serve underserved and vulnerable populations be eligible for grants for expanding public computer center capacity in addition to community colleges and public libraries.

The Coalition recommends the NTIA and the RUS ensure that the qualification criteria of private entity grant applications are consistent with the public interest goals of the Act. Though we recognize the value of private entities in the effective delivery of broadband services, we believe that governments and non-profit organizations have the unique purpose and capacity to act in the public interest as their primary mission.

Broadband serves as an engine of economic growth, enabling communities to develop and expand job-creating businesses and institutions; but, where broadband is inaccessible because it is unaffordable or lacks the speed and capacity necessary to functionally transfer information, the nation as a whole, and our region in particular, lags behind in the global marketplace. Large urban regions like ours have an extraordinary challenge to reduce digital inequities that contribute to educational barriers, unemployment and underemployment, and a continuous cycle of poverty. The NTIA should give special consideration to projects that provide broadband access, with the greatest speed, to the greatest number of people, particularly those who are low income. Public entities working collaboratively with their local partners are uniquely positioned to have the greatest impact toward making broadband accessible to the underserved communities in the fourth most populous city in the nation.

In furtherance of our purpose to serve the public interest, the Coalition endorses the Comments of the National Association of Telecommunications Officers and Advisors (NATOA), as filed and have attached as an appendix.

We respect the due diligence of the NTIA and the RUS and appreciate the diverse public positions that must be considered. We urge the NTIA and the RUS to sincerely consider our recommendations in its development of grant selection criteria and the overall grant process.

If you have any questions regarding these comments, please feel free to contact my office at 832.393.1000 or via email at mayor@cityofhouston.net.

Sincerely,



Bill White
Mayor, City of Houston



Ed Emmett
County Judge, Harris County



John E. Sawyer, Ed.D
County School Superintendent
Harris County Department of Education



Mary Spangler, Ed.D
Chancellor, Houston Community College



Richard E. Wainerdi, Ph.D
President, Texas Medical Center