



April 13, 2009

Ms. Anna Gomez
Deputy Assistant Secretary
National Telecommunications
and Information Administration
US Department of Commerce
1401 Constitution Avenue, NW
Room 4701
Washington, DC 20230

Mr. James R. Newby
Acting Administrator
Rural Utilities Service
US Department of Agriculture
1400 Independence Avenue, SW
Room 5801-S, Stop 3201
Washington, DC 2025

Mr. Michael Copps
Acting Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Deputy Assistant Secretary Gomez, Acting Administrator Newby, and Acting Chairman Copps,

The following comments address questions number seven and eight in the Request for Information published March 12, 2009, by the US Department of Commerce National Telecommunications and Information Administration and the US Department of Agriculture Rural Utilities Service in Docket Number 090309298-9299-01.

In October 2008, Congress enacted the Broadband Data Improvement Act, with unanimous

bipartisan support.¹ Through this legislation, now Public Law 110-385, Congress has established a clear path for broadband expansion through state-based public private partnerships. And now through the American Recovery and Reinvestment Act, Congress has provided \$350 million for implementation of the Broadband Data Improvement Act, thus setting the course for the public and private sectors to work collaboratively for mapping the broadband gaps, filling the broadband gaps, and increasing broadband adoption and computer use – ultimately empowering our nation with more accessible education and healthcare, a better skilled and more mobile workforce, more products to market, and enhanced economic opportunity and quality of life for all Americans.

Connected Nation is a non-profit organization that works with states, local communities, and technology providers to increase broadband adoption and digital literacy for all Americans – both urban and rural.² For the last five years, Connected Nation has worked directly with states, local leaders, consumers, and broadband providers to build public private partnerships to map the statewide gaps in broadband service, conduct local-level research on broadband and computer adoption and the barriers to technology use, develop grassroots technology planning teams in every county across a state for improved broadband adoption, and establish computer distribution and technology literacy programs for low-income and disenfranchised people. We work on behalf of American consumers, and we continue to find, time and again, in communities across our nation, that unserved and underserved people can *and will* overcome broadband challenges when the public and private sectors work together for meaningful change.³

To that end, we applaud Congress for passage of the Broadband Data Improvement Act, and we applaud President Obama, working in cooperation with Congress, to fully fund the Broadband Data Improvement Act through the American Recovery and Reinvestment Act. This action establishes a clear spirit of collaboration between the public and private sectors. We recognize and appreciate that Section 106 of the Broadband Data Improvement Act was based on the Connected Nation model for broadband expansion, and we would like to offer a number of suggestions that would help ensure the Broadband Data Improvement Act and all broadband stimulus funding is implemented in a manner that is effective, accountable, and that achieves the ultimate goal of sustainable broadband access and adoption.

1) Effective broadband mapping must take place through a collaborative, public private partnership approach. This approach should uphold high standards for household-level accuracy and strict requirements for online verification of broadband availability data.

¹PL 110-385,
http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=110_cong_public_laws&docid=f:publ385.110.pdf Letters of support for the Broadband Data Improvement Act are attached as Appendix A.

²For a partial list of Connected Nation's partners see Appendix B.

³Attached as Appendix C to this document are a series of testimonials from state and local officials, affirming the value and effectiveness of statewide public-private partnerships.

The Broadband Data Improvement Act clearly sets forth a straightforward policy for broadband mapping. The law calls for mapping at a residential and business level, and it clearly states that the public and private sectors should work collaboratively to achieve all components of the program. At least nine states are already using this collaborative, public private approach for household-level broadband mapping. These states have achieved or will soon achieve a broadband map that identifies areas unserved by broadband, down to the street and individual household. In those states where a household level broadband map has been developed, applicants for the \$7.2 billion in stimulus funding for broadband infrastructure now have an immediate tool for targeting projects in unserved areas. Additionally, once these infrastructure projects are funded and deployed through the ARRA, the broadband maps – which are continuously updated – will show exactly where and how broadband stimulus grants are being used to fill the broadband gaps.

Plenty of evidence exists to justify why Congress called for household-level mapping in the Broadband Data Improvement Act. This household-level mapping is the only way to truly understand where the broadband gaps exist, particularly in rural areas. If broadband mapping is done at any higher level – at a geographic unit level such as Census units or postal codes such as nine-digit zip – the result will be a severe overestimation of broadband deployment across the United States.

For example, Connect Minnesota has found, through a detailed and granular method of broadband mapping at the household level, that broadband is available to 94% of Minnesota households. If Minnesota's broadband service availability was mapped at the level of census block groups, broadband deployment would be grossly overstated at 99.6%. Even at the most granular census block level, Minnesota would appear to have 96.4% broadband deployment – again, compared to Connect Minnesota's household level mapping which shows 94% availability. Even going down to the census block level, this type of general mapping would assume that nearly 45,000 Minnesota households are served when they are in fact unserved. Even worse, if Minnesota's broadband deployment were mapped in terms of nine-digit zip codes, the process would become substantially more laborious and complicated, and even less accurate, since zip codes at any level are postal codes and not geographic units.⁴

The result of inaccurate and overstated broadband maps would be an inaccurate baseline for broadband deployment as well as inaccurate benchmarks when Congress tries to evaluate the progress and impact of the whole of the broadband stimulus funding. This does not lessen the importance of the FCC's new data collection methods by Census Tract through the reformed Form 477 process, which is a vast improvement over previous FCC data collection by zip codes. However, this type of data collection conducted by the FCC serves a very different purpose from the type of mapping Congress called for in the

⁴For a description of the Connect Minnesota map, see Comments of Diane Wells from the Department of Commerce, State of Minnesota in docket number 090309298-9299-01.
<http://www.ntia.doc.gov/broadbandgrants/comments/790C.pdf>

Broadband Data Improvement Act. FCC data collection by Census Tract (or any other geographic unit) is important for providing macro analyses to inform federal policy development. But it is impractical, unreasonable, and redundant to expect the FCC or any other federal agency to develop household level broadband maps without the support of public-private partnerships working on the ground with consumers and broadband providers to understand exactly where broadband is offered and where it is not.

Connected Nation is a leader in broadband inventory mapping, having produced the first statewide broadband inventory map for Kentucky in 2005. Today we have completed or are in the process of completing maps in nine states across the nation. Our extensive experience working with over 300 providers has shown us that the only viable means to accurately identify where broadband exists and where it does not is in collaboration with the provider community. Some voices have argued that this information can effectively and accurately be obtained through surveys. In our experience, this would be a prohibitively expensive and ultimately futile exercise, particularly when it has been proven in a number of states that a collaborative and voluntary approach to broadband mapping is one that works.

That being said, it is important to understand that mapping the footprints of hundreds of providers of different sizes and types cannot be done in a systematic manner. Mapping entities must adapt to the data resources available to different providers and work with each individual provider constructively to achieve the common goal of accurate, verifiable broadband maps. Quite simply, one-size-fits-all data requirements are unfeasible given the multiple types of providers of different sizes, technologies and corporate structures that provide broadband service across the nation.

Oftentimes, broadband providers – particularly smaller ISPs and rural providers – do not even store data that indicate where they offer broadband service. Mapping projects through public-private partnerships work literally on the ground with these small providers to help them collect, assimilate, and process the information necessary to create broadband maps. These maps are continuously updated so that the maps immediately reflect deployments as they occur – thereby ensuring that local leaders have real-time information about unserved areas so that their efforts and resources are targeted effectively. Just as importantly, public-private partnerships provide daily custom mapping analyses for state and community leaders, overlaying local level research such as broadband barriers and demographic data such as household density on a neighborhood-specific basis. Connected Nation maps vertical assets such as water tanks and cell towers, conducts topographic and propagation analyses, and provides engineering field tests and feasibility studies at a local level. It goes without saying that all of this work is done at no additional cost to local leaders, and is included as part of the statewide efforts to help communities and broadband providers work together in the formation of business plans for sustainable broadband investment and deployment to unserved and underserved areas.

Therefore, it is imperative that the NTIA implement broadband mapping in the manner that Congress has clearly set forth through the Broadband Data Improvement Act – by a

method of household-level mapping through state-based public private partnerships. It is this local, on-the-ground approach to broadband mapping that is now being used by at least nine states and has produced maps of broadband availability and broadband speeds which are accurate, detailed, publicly accessible and transparent, verifiable, continuously updated, and perhaps most importantly, useful for filling the broadband gaps.

Critics of Connected Nation's mapping program argue that maps constructed from data shared on a voluntary basis by providers must be suspect by definition. These voices argue that such a model should be rejected and replaced by either a regulatory mandate to collect the data or a third party means of estimating the extent of the network (through, for example, random sampling). Connected Nation disagrees. First, the only effective means to estimate the extent of broadband service is by using data from the source, the provider community itself. Second, providers have every incentive to be truthful as they report their broadband service territory when there is in place a transparent, effective method of verification of such data. Connected Nation invests extensive resources to that effect as we discuss below.

Source data verification is a critical component of effective broadband inventory mapping for another important reason. Broadband inventory maps represent a visual, geographic estimation of broadband coverage within a state or territory. Maps are an estimation of the true extent of the network and, hence, present inaccuracies that can only be identified and corrected as the data is used and analyzed. Data verification is, therefore, a critical component of any mapping operation. Connected Nation employs and promotes a number of mechanisms to ensure the accuracy of broadband maps, and we encourage NTIA to establish high standards for mapping validation and accuracy:

a. First, Connected Nation engineers conduct extensive field tests, and the results of those tests are documented and compared against provider data to ensure accuracy. In instances where a discrepancy is identified (e.g. a datum shift of coordinates), Connected Nation immediately contacts the agency or provider to outline and implement corrective actions. In all states, including Minnesota, Connected Nation conducts random quality control checks to validate the latitude/longitude of infrastructure such as digital subscriber line access multiplexers (DSLAMs), broadcast towers, and other vertical assets such as water towers. Quality control checks are also conducted via spectrum analyzer to verify the frequencies being used by known unlicensed WISPs or licensed providers. Additionally, speed tests are conducted from the field using all known platforms (e.g. fiber, cable modem, DSL, fixed wireless, mobile wireless, etc.)

b. In addition to internal field tests, Connected Nation establishes in every state a transparent system for external verification of broadband availability data. This verification system includes a web-based mapping portal for consumers, grassroots surveying and verification through local technology teams, and a broadband telephone hotline which encourages consumers to document if they want broadband and cannot get it, or to notify Connected Nation if a map contains any inaccuracies. All inaccuracies are corrected immediately. The only data that are not disclosed are proprietary data such as the exact locations of infrastructure/equipment and the specific network footprint of

individual providers. In addition to the inherent proprietary nature of this data, the exact locations of individual provider's infrastructure and equipment are not disclosed to the public at large in order to protect the physical integrity of the backbone of the US communications system. For example, on March 9, 2009, sabotage to provider infrastructure left tens of thousands of households without landline, cellphone, Internet, or 911 service in the California counties of Santa Cruz, Santa Clara, and San Benito. First responders reportedly resorted to ham radio, door-to-door checks, and increased patrols to prepare for any emergency situations.⁵ Providers and public officials alike want to protect the confidentiality of this sensitive data in order to ameliorate the risk of sabotage. It is this information that Connected Nation translates and processes to develop a household-level depiction of broadband availability, to illustrate the broadband gaps in availability and speed at a level so granular that it is verifiable by all consumers, and then to validate the data through an open, web-based, and publicly transparent broadband map.⁶

In light of our experience, Connected Nation recommends that state programs receiving funding through the BDIA should be required to provide a web-based, interactive map at the household level, ensuring that NTIA can fulfill its statutory mandate through the BDIA to create a webpage that aggregates relevant information made available to the public by grant recipients. In addition, grant recipients should be required to submit a list of all incorporated places, census designated places, and any other communities that are not served by a broadband provider, thereby ensuring that the FCC can fulfill its statutory mandate through the BDIA to "compile a list of geographical areas that are not served by any provider of advanced telecommunications capability." The NTIA and FCC should work together to ensure definitions and requirements are clear in order to produce a standard data set for all unserved areas across the United States.

2) The \$350 million provided in the ARRA for implementation of the Broadband Data Improvement Act is not just about mapping. Indeed, mapping is simply one piece of the larger grant program within the Broadband Data Improvement Act. The bulk of the grant program empowers grassroots-driven broadband awareness and adoption programs. This grassroots component will help ensure that once the \$7.2 billion in ARRA funding for broadband infrastructure is spent, Americans in most need of broadband will directly benefit from it.

What we know is that broadband is available to more than 90% of Americans, yet only about 57% of Americans subscribe to broadband.⁷ In areas where the recession has hit the hardest, broadband adoption is much lower, even in areas where broadband is already universally available. In Licking County, Ohio, more than 97% of residents have

⁵http://www.mercurynews.com/topstories/ci_12119748?nclick_check=1

⁶Connected Nation's maps can be viewed on the websites of Connected Nation's state programs, such as Connect Minnesota at http://connectmn.org/mapping/interactive_map.php, Connect Ohio at http://connectohio.org/mapping_and_research/interactive_map.php, and Connected Tennessee at http://connectedtn.org/broadband_landscape/interactive_map.php.

⁷Pew Internet and American Life Project, December 2008 survey of American residents.

broadband service available; however, only 54% subscribe to broadband at home. One of the more striking examples falls in Clay County, Tennessee, where 100% of residents have broadband available, but only 23% subscribe. These examples are not limited to Ohio and Tennessee. In communities across our country, Americans are not taking advantage of the benefits of broadband, even when it is available. This does not diminish the need for deploying broadband to areas that are unserved and underserved – the \$7.2 billion in stimulus funding for broadband deployment in the areas where it is needed is a critical and necessary piece to the ARRA broadband funding. However, the ultimate measure of success and accountability for the \$7.2 billion will come down to whether or not people use broadband once the pipes and towers are built.

The Pew Internet and American Life Project conducted a recent study asking those who don't use broadband why they don't use it.⁸ Pew found that 18% of those who haven't adopted broadband say it's a matter of price. Another 14% said broadband is not available where they live. Connected Nation's state and local surveys – which are conducted through a methodology that mirrors Pew's surveys – find similar results. This research reinforces the need for the \$7.2 billion in broadband infrastructure funding, and further reinforces the need for affordable broadband offerings. However, Pew also found that the top barrier to broadband adoption is not price or availability, but rather, a lack of demand for broadband services. More than half of those who have not adopted broadband say it's not relevant to them – they are not interested in broadband, too busy for broadband, and the like. Another 17% say broadband is too difficult to use or a waste of time. Connected Nation has been conducting similar surveys at the state and local level for the last five years, and the results are strikingly similar in both urban and rural areas – there is a dire need for broadband awareness, education, and training. It is only when people actually use broadband that we start to see the real and long-term economic benefits.⁹

The \$350 million set aside in the ARRA for implementation of the Broadband Data Improvement Act, along with the additional \$250 million for demand stimulation programs, and the \$200 million for strengthening public computing centers at libraries and community colleges, provide a clear vehicle for ensuring that the broadband infrastructure funding will bring about maximum, long-term economic stimulus. In particular, the grant program in the Broadband Data Improvement Act includes a series of requirements for state-based broadband expansion programs. These requirements boil down to five primary elements:

⁸Horrigan, John. Obama's Online Opportunities II: If you build it, will they log on? Pew Internet and American Life Project. January 2009.

⁹Results of Connected Nation's most recent survey research can be found on Connected Tennessee's website at http://connectedtn.org/research/Tennessee_Technology_Trends_2008.php, and on Connect Ohio's website at http://connectohio.org/mapping_and_research/Technology_Assessment.php. Local survey research for each Tennessee county can be found at http://connectedtn.org/find_your_county/. Local survey research for each Ohio county can be found at http://connectohio.org/mapping_and_research/county_profiles/.

- 1) Broadband mapping at a household and business level;
- 2) Local research in every county across a state to identify the specific barriers to broadband adoption in each community;
- 3) Local technology planning teams in every county across a state, which will use the broadband maps and local research to develop tactical and community-specific business plans for technology expansion;
- 4) Computer connectivity programs for low-income and underserved populations; and
- 5) Thematic collaboration and cooperation between the public and private sectors across all program elements.

These five elements of the Broadband Data Improvement Act are very familiar to Connected Nation because they are the same five elements that make up the state-based public-private partnerships in Ohio, Tennessee, and Kentucky, and the dozens of other states that are working toward implementation of similar programs, based on the best practices for statewide broadband expansion which continue to develop in these three states. Ohio, Tennessee, and Kentucky have demonstrated – and continue to demonstrate – that all five programmatic elements of the Broadband Data Improvement Act are critical for success in mapping the broadband gaps, stimulating broadband demand, closing the digital gap, and ultimately increasing broadband adoption and economic prosperity.

In Tennessee, after 18 months of on-the-ground work by the Connected Tennessee public private partnership for statewide broadband expansion, home broadband adoption has increased by 26% compared to an estimated 15% growth nationally. Computer ownership in Tennessee has more than doubled national growth – increasing by 7% compared to an estimated 3% national growth. Tennessee has now surpassed (by 10 percentage points) the national average of 74% of Americans who use the Internet from home or some other location. In Tennessee, 84% of residents use the Internet. Underserved populations in Tennessee have seen the largest increases in broadband adoption and computer ownership, particularly among those demographics which have been targeted through the Connected Tennessee program. Broadband adoption among low-income minorities grew by 90% within the first year of Connected Tennessee's work.¹⁰

In public comments filed as part of this docket, the Broadband Diversity Supporters recommend that BTOP grants should stimulate broadband adoption and telecom literacy for low-income, minority and multicultural consumers.¹¹ Connected Nation supports the filing of the Broadband Diversity Supporters, and we urge the NTIA and RUS to require effective broadband adoption and computer literacy programs as part of the Broadband Data Improvement Act grant program for state-based public private partnerships.

¹⁰Connected Nation. The Call to Connect Minority Americans: A Connected Nation Policy Brief. March 27, 2009. http://connectednation.org/research/Minority_Americans_Policy_Brief.php. Also attached as an appendix to this document.

¹¹Comments filed in this docket on April 13, 2009 by the Broadband Diversity Supporters.

3) The grant program set forth in the Broadband Data Improvement Act should be implemented to empower new statewide public-private partnerships, while also ensuring continued funding for existing statewide programs that have proven to be effective. Statewide programs should be required to fulfill all criteria set forth in the Broadband Data Improvement Act to ensure programs are effective, efficient, transparent, and accountable.

Some states are already engaged in statewide programs for broadband stimulation, including broadband inventory mapping and grassroots demand promotion programs. Investments made by visionary states to implement these programs should be taken into account by the NTIA as they design the BDIA implementation rules. In particular, Connected Nation recommends the following considerations:

- Multi-year grants should be encouraged. The spirit of the BDIA grant program is to enable state-based public-private partnerships that work collaboratively on a continuing basis to bring about meaningful change in broadband access and use. The BDIA grant program is based on the Connected Nation model, which must allow for a two-year program at the least in order to be effective; these are usually three-year programs. To promote efficient use of stimulus dollars, NTIA should allow eligible entities to apply for multi-year grants. This allowance would enable eligible entities to devote 100% of their time to program implementation and operation, instead of spending a large portion of each year reapplying for subsequent years.
- Applicants should be able to spread the 20% non-federal match across multiple project years. The state programs enabled through the BDIA grant program will average \$2 million per year. Given that a large impetus for stimulus dollars is to counter state budget deficits across America, it will be difficult for states and state-based public private partnerships to commit 20% of the cost of a multi-year project up front. If the grant program stipulates that eligible entities may spread the 20% match across multiple project years, this match will become much more feasible.
- Pre-grant expenses should be eligible for 20% match. States which have explicitly committed pre-grant funding toward the creation of a collaborative public private map of broadband availability at the household level should have the ability to count those expenses toward the 20% match.
- Allowance for limited in-kind match. BDIA grant applicants should have the flexibility to apply certain limited in-kind contributions toward the 20% non-federal match. These contributions should be limited to tangible and depreciable items such as computer hardware and software that will be donated through computer distribution programs or similar programs to improve computer

ownership and Internet access. In order to maintain strict accountability, operational and administrative costs should not be eligible for the 20% match.

- Annual accountability measures should be required of all grant recipients. Documented and empirical methods of tracking broadband availability and adoption should be required of all grant recipients. Additionally, grant recipients should be required to submit an annual report on progress, to include:
 - Number and percentage of unserved households by state and by county;
 - Broadband adoption rates by state and by county;
 - Number and percentage of local technology planning teams meeting BDIA program requirements that have been formed and are operating within a state;
 - Number and percentage of tactical business plans generated by local technology planning teams across a state;
 - Online access to GIS maps as required in the BDIA;
 - Online access to tactical business plans generated by local technology planning teams;
 - Online access to local market intelligence and consumer research for each county, to include barriers to broadband adoption within each county; and
 - Detailed description and statistics of programs that have been established to improve computer ownership and Internet access for unserved and low-income populations across the state.

- Eligible entities for operation of state programs should be limited to those defined in Public Law 110-385. The law specifically defines eligible entities to include state or local government agencies, non-profits, and independent agencies of which the state is a member. The intent of the legislation was clear in its limited definition, which does not include for-profit entities. NTIA rules should stipulate that if a state chooses to subcontract any portions of the grant program components, the eligible entities for subcontracts are limited to the definition of eligible entities within the BDIA, Public Law 110-385.

Public private partnerships have proven themselves as the most effective vehicle for progressive change in broadband availability and adoption. There will be voices that choose to ignore the path that Congress has laid. These voices will push for public coercion of data and working against the private sector in this endeavor. However, when one looks past the self-interested positioning and looks objectively at what really works to map broadband availability, fill the broadband gaps, and bridge the digital divide for Americans on Main Street, it is clear that a successful approach is a collaborative, cooperative model whereby the public and private sectors work together to bring broadband to all Americans.

Respectfully,



Brian Mefford
CEO Connected Nation, Inc.

APPENDIX:

- A. Letters of support for the Broadband Data Improvement Act
- B. Connected Nation's Private Sector Partners
- C. Selected testimonials in support of Connected Nation
- D. Connected Nation Broadband Provider List
- E. Exhibit Maps for Connected Nation Testimony before the United State House of Representatives Committee on Energy and Commerce, Subcommittee on Communications, Technology, and the Internet on April 2, 2009
- F. The Call to Connect Minority Americans: A Connected Nation Policy Brief

July 11, 2008

The Honorable Daniel K. Inouye
Chairman
Senate Commerce Committee
Washington, D.C. 20510

The Honorable John D. Dingell
Chairman
House Committee on Energy and Commerce
Washington, D.C. 20515

The Honorable Ted Stevens
Vice Chairman
Senate Commerce Committee
Washington, D.C. 20510

The Honorable Joe Barton
Ranking Member
House Committee on Energy and Commerce
Washington, D.C. 20515

Dear Chairman Inouye, Vice Chairman Stevens, Chairman Dingell and Ranking Member Barton:

The undersigned organizations write to express our strong support for Congressional action to promote greater availability and adoption of broadband high-speed Internet services.

The leading bills pending before Congress (S. 1492, the Broadband Data Improvement Act and H.R. 3919, the Broadband Census of America Act of 2007) would improve information-gathering about current broadband deployment and assist in targeting resources to areas in need of such services. A recent FCC order requires more focused broadband data collection from broadband providers but does not address other important broadband mapping elements contained in the pending legislation.

We believe Congress should adopt legislation this year that provides federal government support for state initiatives using public-private partnerships to identify gaps in broadband coverage and to develop both the supply of and demand for broadband in those areas. The ability to accelerate deployment and adoption by bringing together government, broadband providers, business, labor, farm organizations, librarians, educators, and consumer groups in public-private partnerships is greater than the ability of these diverse players standing alone.

Adopting a national policy to stimulate subscription where it is already available, and deployment where it is not, could have dramatic and far-reaching economic impacts. For example, a Connected Nation study released February 2008 estimated the total annual economic impact of accelerating broadband across the nation to be more than \$134 billion. In addition to the \$134 billion total benefit, the study found that increasing broadband adoption by another seven percent could result in:

- **\$92 billion** through an additional 2.4 million jobs per year created or retained;
- **\$662 million** saved per year in reduced healthcare costs;
- **\$6.4 billion** per year in mileage savings from unnecessary driving;

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- **\$18 million** in carbon credits associated with 3.2 billion fewer pounds of CO2 emissions per year in the United States; and
- **\$35.2 billion** in value from 3.8 billion more hours saved per year from accessing broadband at home.

We cannot afford to let another year go by without adopting policies that will stimulate the economy in such ways, while expanding use of the networks that are already deployed and providing broadband in previously underserved areas. That is why we urge you to work in a bipartisan, bicameral way to enact federal legislation this year.

Thank you for your timely consideration of this important issue.

Sincerely,

AT&T

Alliance for Public Technology

American Association of People with Disabilities

American Library Association

Cablevision

Charter Communications

The Children's Partnership

Comcast

Communications Workers of America

Connected Nation

Cox Communications

EDUCAUSE

Embarq

Independent Telephone & Telecommunications Alliance

Information Technology Industry Council

International Brotherhood of Electrical Workers

Internet Innovation Alliance

NIC, Inc.

National Cable and Telecommunications Association

National Farmers Union

The National Grange

National Rural Health Association

Organization for the Promotion and Advancement of Small Telecommunications

Companies

Qwest

Time Warner Cable

U.S. Cattlemen's Association

U.S. Chamber of Commerce

United States Telecom Association

Verizon

Western Telecommunications Association

Windstream

July 11, 2008

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cc: The Honorable Harry Reid
The Honorable Mitch McConnell
The Honorable Richard J. Durbin
The Honorable Jon Kyl
The Honorable Nancy Pelosi
The Honorable Steny H. Hoyer
The Honorable John A. Boehner
The Honorable Edward J. Markey
The Honorable Cliff Stearns

December 22, 2008

The Honorable Daniel K. Inouye
U.S. Senate
Washington, D.C. 20510

The Honorable David Obey
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Thad Cochran
U.S. Senate
Washington, D.C. 20510

The Honorable Jerry Lewis
U.S. House of Representatives
Washington, D.C. 20515

Dear Chairman Inouye, Ranking Member Cochran, Chairman Obey and Ranking Member Lewis:

As Congress begins developing important economic recovery legislation, the undersigned organizations urge you to support full funding for the Broadband Data Improvement Act. This legislation would jumpstart comprehensive broadband initiatives in many states, leading to rapid positive economic benefits as broadband coverage gaps are erased and broadband adoption rates rise.

Passed by unanimous consent in the U.S. House of Representatives and the U.S. Senate, S. 1492 – the Broadband Data Improvement Act – is the culmination of almost two years of work by the U.S. House of Representatives and U.S. Senate. Working in a bi-partisan manner, Congress achieved consensus on the beginning of a national broadband plan that includes the model of public-private partnerships leveraging their strengths to improve the quality-of-life for all Americans.

The attached letter was sent to the U.S. Congress in July advocating for the passage of broadband legislation before the close of the 110th Congress. As proponents of the passage of this important legislation, we also advocate for funding to implement it as soon as possible. Estimates for full funding of this important element of broadband improvement range from \$200 million to \$335 million.

Broadband availability and usage is critical infrastructure in a 21st century economy, and it is crucial that the Congress work in a bipartisan, bicameral way to fully fund the Broadband Data Improvement Act as part of a broadband component of any economic stimulus bill considered in the 111th Congress.

Thank you for your timely consideration of this important issue.

Sincerely,
AT&T
Alliance for Public Technology
American Association of People with Disabilities
American Library Association
Cablevision
Charter Communications
Comcast
Communications Workers of America
Connected Nation

Cox Communications
EDUCAUSE
FTTH Council, North America
Independent Telephone & Telecommunications Alliance
Information Technology Association of America
International Brotherhood of Electrical Workers
NIC, Inc.
National Cable and Telecommunications Association
National Consumers League
National Farmers Union
The National Grange
National Rural Health Association
Organization for the Promotion and Advancement of Small Telecommunications
Companies
Qwest
Telecommunications Industry Association
Time Warner Cable
U.S. Cattlemen's Association
U.S. Chamber of Commerce
United States Telecom Association
Verizon
Western Telecommunications Association
Windstream

cc: The Honorable Harry Reid
The Honorable Mitch McConnell
The Honorable Richard J. Durbin
The Honorable Jon Kyl
The Honorable Nancy Pelosi
The Honorable Steny H. Hoyer
The Honorable John A. Boehner
The Honorable John D. Rockefeller
The Honorable Kay Bailey Hutchison
The Honorable Barbara Mikulski
The Honorable Richard Shelby
The Honorable Henry Waxman
The Honorable Joe Barton
The Honorable Alan Mollohan
The Honorable Rodney Frelinghuysen
The Honorable Edward J. Markey
The Honorable Cliff Stearns

Appendix B: Connected Nation's Private Sector Partners

- American Academy of Nursing
- The American Farm Bureau Federation
- The American Homeowners Grassroots Alliance
- AT&
- The Children's Partnership
- Cisco Systems
- Comcast
- The Communications Workers of America (CWA)
- CTIA, The Wireless Association
- The Entertainment Consumers Association
- The Information Technology and Innovation Foundation (ITIF)
- Intel Corporation
- The Internet Innovation Alliance
- The Joint Center for Political & Economic Studies
- The Kansas Farm Bureau
- Microsoft
- The Minority Media and Telecommunications Council
- The National Association of State Chief Information Officers
- The National Cable Telecommunications Association
- The National Consumers League
- The National Grange
- NIC
- The Telecommunications Industry Association
- The Phoenix Center for Advanced Legal and Economic Studies
- The U.S. Chamber of Commerce
- USTelecom
- Verizon
- Voyant International Corporation
- The World Institute on Disability

Connected Nation state-level partnerships include multiple other public and private organizations representing diverse interests and constituents across the country.



MINNESOTA
DEPARTMENT OF
COMMERCE

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April 13, 2009

Ms. Anna Gomez
Deputy Assistant Secretary
National Telecommunications
and Information Administration
US Department of Commerce
1401 Constitution Avenue NW
Room 4701
Washington, DC 20230

Mr. James R. Newby
Acting Administrator
Rural Utilities Service
US Department of Agriculture
1400 Independence Avenue SW
Room 5801-S, Stop 3201
Washington, DC 20250

Mr. Michael Copps
Acting Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Dear Deputy Assistant Secretary Gomez, Acting Chairman Copps, and Acting Administrator Newby:

When the State of Minnesota began its creation of a statewide broadband inventory map last year, pursuant to the state's standard operating procedure, we issued a request for proposals. Through this competitive bidding process, Connected Nation, Inc. was ultimately selected as the most qualified organization to produce and maintain a broadband map for the State of Minnesota.

In February of this year, Connected Nation provided to the State web-based maps of broadband availability in Minnesota, displaying broadband service in a searchable and verifiable format, down to the household level.

Minnesota is pleased with the work of Connect Minnesota, the state-based non-profit organization established by Connected Nation to manage our broadband mapping program. Despite assertions to the contrary, Connected Nation and Connect Minnesota have provided to the State everything requested or required, per the state contract. Specifically, Connect Minnesota rapidly implemented a program that has produced a map of Minnesota broadband availability, down to the street and individual household level. The map represents the service offerings of 104 broadband providers to date who have voluntarily agreed to participate in this mapping project. Consumers, government officials, local leaders, and potential broadband providers can use this interactive web-based map to understand precisely where broadband exists by type of platform, where unserved neighborhoods exist, and what those neighborhoods look like – how rural, the topography, the household density, and other key factors impacting the broadband market. As specified in the contract, Connect Minnesota continues to work on the ground with all broadband providers to update and refine this household level database of broadband availability, speeds, and demographics.

As a result, the State of Minnesota now has an invaluable set of tools for identifying unserved and underserved households in our state, understanding why households are still unserved, and

Deputy Assistant Secretary Gomez, Acting Chairman Copps, and Acting Administrator Newby
April 13, 2009
Page Two

developing specific policies to promote expansion of the broadband market to ensure all Minnesota residents have access to broadband.

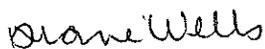
It appears there are concerns by some parties as to whether the Minnesota broadband map is verifiable. The State of Minnesota has taken a great deal of caution and care to ensure that this map is not only "verifiable," but is indeed verified on a continuing basis. This was an important factor in our evaluation of responses to our request for mapping services.

Because the raw network information that is used to create and update the map is too vast to be directly verifiable, we have worked with Connected Nation to develop a web-based mapping portal whereby the actual broadband availability data (which *are* verifiable) are publicly transparent for each household. Every Minnesota resident can check the map, or work over the phone with Connect Minnesota to check the map, for a listing of broadband providers serving each Minnesota address. Any inaccuracies are corrected immediately, in real time. In addition, Connected Nation engineers conduct extensive field tests, and the results of those tests are documented and compared against provider data to ensure accuracy.

The State selected Connected Nation as a result of the company's innovative model that works on behalf of the State to develop high quality and verifiable products. Further, the State of Minnesota decided that Connected Nation's approach to mapping, based on voluntary collaboration with the provider community, is the most expedient and effective way to produce this important policy tool. Now having this tool in hand to inform our public policy, we are confident we made the correct choice.

Connected Nation and Connect Minnesota have been excellent partners for Minnesota. As you develop a plan for mapping broadband availability across the United States, we invite and encourage you to look closely at Minnesota's broadband mapping process. We believe you will find an excellent model for mapping broadband availability in such a way that is transparent, verifiable, continuously updated, and perhaps most importantly, practical and valuable for identifying those unserved and underserved areas of Minnesota.

Respectfully,



DIANE WELLS
Manager, Telecommunications Division
Minnesota Department of Commerce

DW/cw

c: Members of the House Committee on Energy & Commerce Subcommittee on
Communications, Technology, and the Internet

PHIL BREDESEN
THE GOVERNOR OF TENNESSEE

13 April 2009

Ms. Anna Gomez
Deputy Assistant Secretary
U.S. Department of Commerce
National Telecommunications and Information Administration
Herbert C. Hoover Building (HCHB)
U.S. Department of Commerce / NTIA
1401 Constitution Avenue, N.W.
Washington, D.C. 20230

Dear Secretary Gomez:

Connected Tennessee has been active in the State of Tennessee since 2006 working to bring broadband availability to all Tennesseans and using innovative techniques to ensure that more and more citizens of the Volunteer State every day realize the benefits of broadband adoption.

Pursuant to P.L. 110-385, the Broadband Data Improvement Act (Section 106, subsection (i)(2)(B)), the State of Tennessee hereby designates Connected Tennessee as the single eligible entity in Tennessee to receive a grant under the State Broadband Data & Development Grant Program.

This is also to express Tennessee's strong support for full funding of the State Broadband Data and Development Grant Program, which was created in Sec. 106 of P.L. 110-385, the Broadband Data Improvement Act, and to which the NTIA can apply up to \$350 million from funding allocated in P.L. 111-5, the American Recovery and Reinvestment Act.

The State Broadband Data and Development Grant Program was based on a concept of statewide broadband initiatives that Tennessee has adopted, funded and initiated. The comprehensive approach to broadband advancement taken by Tennessee has yielded measurable and positive results for our citizens.

Since the start of our initiative, we have seen concrete and positive benefits, including home broadband adoption growth of 26% compared to an estimated 15% growth nationally. Computer ownership in Tennessee has more than doubled the national growth – increasing by 7%

compared to an estimated 3% nationally. Tennessee has now surpassed (by 10 percentage points) the national average of 74% of Americans who use the Internet from home location. In Tennessee, 84% of residents use the Internet. Underserved populations in Tennessee have seen the largest increases in broadband adoption and computer ownership, particularly among those demographics which have been targeted through the Connected Tennessee program. Broadband adoption among low-income minorities grew by 90% within the first year of Connected Tennessee's work.

Connected Tennessee's broadband initiative already has in place the activities required under the State Broadband Data and Development Grant Program to qualify for grant funds. Granular statewide broadband inventory maps, local grassroots demand creation teams, regular and local consumer research, collaboration with broadband service providers to extend broadband service to the unserved and programs to improve computer ownership are all elements of Connected Tennessee.

Furthermore, Connected Tennessee's research and mapping capabilities will be critical to Tennessee as we engage them to develop plans to promote broadband adoption and to bring new levels of service and affordability to our businesses and residences.

While Tennessee began this important work using state funds, our state needs federal help to continue and finish the work we have started. Congress unanimously passed the Broadband Data Improvement Act and created the State Broadband Data and Development Grant Program, deliberately providing \$350 million in the American Recovery and Reinvestment Act so that NTIA would have full funding for this important program. It is an indispensable part of a comprehensive federal approach to broadband improvement.

It is imperative for P.L. 110-385 to be implemented as rapidly as P.L. 111-5 which will make funding available expediently to states, including the Volunteer State, through the State Broadband Data and Development Grant Program.

Please contact Mr. John Morgan, Deputy to the Governor, at 615-253-7700, with any questions.

Sincerely,



Phil Bredesen



TED STRICKLAND
GOVERNOR
STATE OF OHIO

August 22, 2008

Chairman Kevin J. Martin
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Notice of Ex Parte Communication in the Matter of WC Docket 07-38
(Broadband Data Collection)

Dear Chairman Martin:

The State of Ohio recently embarked upon an initiative to expand broadband and improve technology adoption. This initiative, Connect Ohio, is a public-private partnership made up of the State, broadband service providers, regional technology groups, economic development organizations, and local leaders in every Ohio county.

In June, Connect Ohio publicly released its initial statewide broadband inventory map, along with data on computer and Internet use and findings regarding barriers to use. Local leaders in all 88 Ohio counties will use this broadband map, in concert with the extensive consumer data, to develop and integrate strategic technology plans to fill Ohio's broadband gaps, improve technology literacy, and bridge the digital divide.

We are also distributing new computers to low-income children through the No Child Left Offline program. Private sector donors continue to step up and support this important effort.

I understand that the Federal Communications Commission is considering its role in the process of mapping broadband infrastructure. I welcome this initiative, because I know we share the common goal of bringing critical broadband infrastructure to every one of our citizens. And, in your consideration, I urge you to work with, facilitate, and encourage public-private partnerships like Connect Ohio. These programs are taking hold and proving to be an effective method of achieving the goal of ubiquitous broadband that we share.

Connect Ohio's state-based broadband maps are critical to the program's success. The accuracy and usefulness of these maps depend upon our ability to work with broadband providers, community leaders, and consumers through a collaborative process whereby we help each other build, verify, and update the maps. A federal program that works with and supports state-based broadband mapping through public-private partnerships would be a solutions-oriented approach to national broadband mapping.

Page 2
Chairman Martin
August 22, 2008

I am encouraged by proposed Congressional legislation to enable and extend resources for public-private partnerships in every state. It is my hope that the Federal Communications Commission will unite in this effort to enable state-based, grassroots-driven broadband mapping and technology expansion for all Americans.

Sincerely,

A handwritten signature in cursive script that reads "Ted Strickland".

Ted Strickland
Governor

cc:

Commissioner Michael J. Copps
Commissioner Jonathan S. Adelstein
Commissioner Deborah Taylor Tate
Commissioner Robert M. McDowell
Marlene Dortch, Secretary

City of Monterey

Dennis Atha, Mayor
610 Monterey Pike
Owenton, Kentucky 40359

July 14, 2008

Dear Chairman Martin,

Thank you for your efforts to ensure that all citizens have access to broadband. This issue is particularly important to me, as I have seen Monterey, Kentucky go from dial-up to broadband within the last year.

Our small community is full of artisans and craftsman who can now sell their products all over the world. We would probably still be on dial-up if it weren't for ConnectKentucky bringing us together with Southeast Telephone to build support and find funds for broadband infrastructure.

It has recently come to my attention that ConnectKentucky has been accused of being "dominated" by incumbent telephone companies and that the ConnectKentucky maps are not accurate. I speak from direct experience when I tell you that these claims are false and entirely unfounded – and ConnectKentucky's work in Monterey stands as testament to this fact.

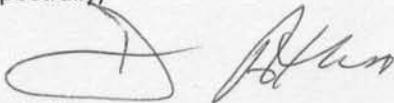
To begin with, the broadband provider which was identified by ConnectKentucky to best serve Monterey is *not* an incumbent telephone company, but is a competitive local exchange carrier, Southeast Telephone, which works to serve Kentucky's rural areas. This company is just one of the many small, local broadband providers that ConnectKentucky works with in our region and across the state to ensure all citizens have access to broadband.

In regard to ConnectKentucky's maps – these are the tools which laid the groundwork for our strategy to deploy broadband to Monterey and surrounding areas that had no service. These mapping tools are essential in identifying citizens who do not have access to broadband. ConnectKentucky has achieved what no one else could do – it brought together all the right players and invested significant resources to map broadband availability in a comprehensive and accurate fashion. I saw firsthand how the process works – ConnectKentucky works with providers – big and small – to gather information on where broadband service exists, and then they work with local communities, businesses, and citizens to make sure the map is correct. And then ConnectKentucky produces these maps and all kinds of related tools on its website for all to use. To say that these maps are not transparent or not useful is an injustice – and is utterly ridiculous. This process for cooperative mapping is a model that should not only be heralded, but should be used again and again for the rest of America.

I was delighted to hear of the growth of ConnectKentucky's work to other states, and I now understand that several states have maps similar to the ConnectKentucky maps. It is my hope that the FCC can use this successful ConnectKentucky model as a guide in leading America to broadband solutions for everyone.

Again, thank you for your work on this important issue.

Respectfully,



Dennis Atha
Mayor
City of Monterey

cc: Commissioner Jonathan Adelstein
Commissioner Michael Copps
Commissioner Robert McDowell
Commissioner Deborah Tate



Commonwealth of Kentucky

Magistrates

Alan Whaley

Bobby Fogle

Henry W. Bertram

Pendleton County Judge/Executive

233 Main St. Room 4

Falmouth, Kentucky 41040

Ph (859) 654-4321 Fax (859) 654-5047

Cell Ph (859) 743-6559

pendjud@fuse.net

www.pendletoncounty.ky.gov

Magistrates

Gary Veirs

Stacey Wells

July 19, 2008

Chairman Kevin J. Martin
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Dear Chairman Martin:

I am writing today to tell you the story of how Pendleton County, Kentucky got broadband, in hopes that it might help as you work toward addressing America's broadband gap.

Less than two years ago, Pendleton County had virtually no broadband service available for our rural citizens. Our rural areas are simply too sparsely populated for the telephone and cable companies to sustain viable networks.

Fortunately, there is a nonprofit group in our state called ConnectKentucky. The folks at ConnectKentucky work with communities across the state to bring broadband to everyone. Three years ago, ConnectKentucky reached out to me and helped me pull together a team of local community leaders, and together we developed an action plan for not only filling our broadband gaps, but also for creating effective broadband applications to enable citizen services, and for generating awareness about the benefits of broadband to increase the actual use of these services.

I am proud to say that this effort has been extremely successful. ConnectKentucky helped us identify a small broadband provider, Blue One, whose technology and business model fits our rural market. Blue One partnered with the Pendleton County Fiscal Court to deploy an extensive wireless network to our rural residents who had nothing but dial-up. As a result of our work, these citizens and businesses of Pendleton County are now part of a global economy. When we started this process in 2005, less than 50% of Pendleton County residents could subscribe to broadband. Now more than 90% of residents have broadband or have access to broadband in a county where the largest city has a population of around 2,000.

But there is an important part of this story that never gets told – none of this would have been possible without ConnectKentucky’s broadband maps and on-site work to make sure these maps are complete and useful. The ConnectKentucky folks get out in the mud with locals and service providers to understand exactly which homes have broadband available and which do not – and these maps are always up-to-date on their website for everyone to use. These maps allowed us to pinpoint the areas where broadband service was not available – and the areas where broadband service would not be available anytime soon. The maps also allowed us to target our public funds for broadband deployment in those areas where it was most needed.

Without the ConnectKentucky maps and the work of ConnectKentucky staff in the field to keep the maps current and accurate, Pendleton County would never had had the tools to develop our network, and we would very likely still have more than half of our residents without broadband.

I understand the FCC is considering doing this type of broadband mapping. As you contemplate this process, I urge you to leave broadband mapping in the hands of public-private partnerships such as ConnectKentucky. Many government entities have tried, and failed, to produce accurate and comprehensive broadband availability maps. Fortunately, there are groups out there who can bring together local leaders and broadband providers of all sizes and technology types to accurately map broadband in a way that is useful for all of us. Pendleton County is proof that this process works.

I also understand that other states need broadband maps like Kentucky’s map. The best thing the FCC could do is to find a way for these types of public-private partnerships to flourish in other states. An FCC mapping program could very well squash these efforts. And these are the very broadband maps that have proven to work.

Thank you for your consideration and for your continued work to expand broadband to all Americans.

Sincerely,

A handwritten signature in blue ink that reads "Henry Bertram".

Henry Bertram
County Judge Executive
Pendleton County

cc:

Commissioner Michael J. Copps
Commissioner Jonathan S. Adelstein
Commissioner Deborah Taylor Tate
Commissioner Robert M. McDowell

Wednesday, September 03

The Honorable Kevin J. Martin
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Notice of Ex Parte Communication in the Matter of WC Docket 07-38
(Broadband Data Collection)

Dear Chairman Martin:

Hello, I am writing in support of the work being done by Connected Nation and its Kentucky based initiative, ConnectKentucky. I have been very impressed with the work and accomplishments of the Connected Nation organization to improve broadband data, deployment, and adoption in Kentucky and, in particular, Louisville.

Recent studies show that a digital divide exists, and affects states like Kentucky with less access and lower adoption rates for technology. This digital divide, however, does not only affect rural areas. Urban areas like Louisville experience the same problem of low technology adoption which prevents many benefits of broadband from penetrating to our disadvantaged citizens. Connected Nation's model takes into account this fact. Their model, in particular the granular broadband availability mapping of Jefferson County that is updated on a regular basis, and their Computer 4 Kids program have combined to be the right tools and partners we local officials need to create rapid positive results.

Many of our area schools and students have been the beneficiary of Connected Nation's work, highlighted by their recent grants totaling \$125,000 to Jefferson County so far in 2008 through ConnectKentucky's Computers 4 Kids program.

As a member of the National League of Cities Information, Technology, and Steering Committee, I am very aware of the importance of technology and its role in improving the lives of underprivileged populations. Connected Nation's work in Louisville will improve computer literacy and education for area students. I am proud to be one of their many supporters.

I look forward to continuing my relationship with Connected Nation and commend them for all of their efforts in Louisville, Kentucky.

Sincerely,

Kevin J. Kramer

District 11 Councilman

Cc:

Commissioner Jonathan Adelstein

Commissioner Michael Copps

Commissioner Robert McDowell

Commissioner Deborah Tate

Marlene Dortch, Secretary

July 9, 2008

Dear Chairman Martin:

As an economic development professional of a Kentucky county that has recently implemented a public broadband project, I believe it is my duty to give you a first-hand account of the support and assistance that ConnectKentucky has brought to our municipality and the rural citizens of our county. I understand there are allegations that ConnectKentucky does not support municipal broadband projects; however, this is simply untrue.

ConnectKentucky worked with us, the Washington Fiscal Court and the City of Springfield, to determine the best solution for expanding broadband into the rural areas of Springfield and Washington County. While it is evident that ConnectKentucky works with local officials and broadband providers in Kentucky to bring the highest bandwidth solutions to each citizen and business, ConnectKentucky is also realistic enough to understand that there is not always a viable business case for fiber to every home – which was the case for us – we simply did not have the funding for a fiber optic system, nor did our citizens want to be taxed for it. Fiber was simply not a feasible or sustainable option. And so ConnectKentucky listened to our needs and recommended a fixed wireless system to bring broadband to our residents and businesses who had nothing but dial-up for the foreseeable future.

When we needed a partner in this effort to provide the broadband services, ConnectKentucky introduced us to a wireless Internet service provider, KyWiMax – a small, Kentucky-based company which has developed successful wireless solutions through other projects in Boyle, Lincoln, and Garrard Counties.

But ConnectKentucky did not stop with a recommendation and introduction. Using the detailed maps that they create, ConnectKentucky conducted an extensive engineering assessment of our county's unserved areas, identifying vertical assets such as water towers and existing cell towers that could be used for the network. And as a result, we have been able to construct a network without building any additional towers, using our existing resources in partnership with Springfield Water and Sewer and cellular companies. It was ConnectKentucky who brought all of these players together and conducted the technical work to enable the project's success. ConnectKentucky did not charge us for any of this work, of course, because this is part of what they do for local officials throughout our state.

The broadband project implementation is well underway. At project completion, over 90% of Washington County's households will have access to broadband. That's up from 50% of households just last year. Many residents and businesses are now using broadband for education, healthcare, government services, working from home, buying and selling products online, and a whole host of other activities that dramatically improves their quality of life.

As you work to determine the best course for FCC action in mapping broadband availability, I encourage you to develop policies that will encourage public-private partnerships like ConnectKentucky to continue to thrive. These grassroots-led programs not only do an excellent job of mapping broadband availability, but they also provide a tremendous resource to local governments as we work to find information technology solutions for our citizens.

Thank you for your consideration.

Sincerely,

Hal Goode
Springfield-Washington Economic Development Authority

cc:

Commissioner Jonathan Adelstein
Commissioner Michael Copps
Commissioner Robert McDowell
Commissioner Deborah Tate

Brent Graden
Director of Economic Development
City of Prestonsburg
200 North Lake Drive
Prestonsburg KY 41653
606-886-2335
606-226-9353

Federal Communications Commission

To Whom it May Concern:

It has recently come to my attention that Connected Nation, a non-profit whose goal is to help bridge the digital divide in communities across America, has recently come under attack from municipal utility broadband providers. They question the value of programs like ConnectKentucky and are trying to stop Federal support to expand their mapping process into other states.

It is my opinion that ConnectKentucky and other programs like it are an invaluable tool to help communities help themselves. Their invaluable leadership and knowledge base helps to create a public-private partnership that stimulates the local economy, promotes education, increases tourism and development, and offers increased access to broadband in underdeveloped or rural areas.

As the Director of Economic Development, it my job to find new and affordable ways to grow the local economy while not breaking the bank. Through the leadership of ConnectKentucky and local politicians, it was determined that we wanted to stimulate the local economy through technology. It was further determined that we would use a wireless internet network to accomplish this task. Meraki Networks was used to set up a wireless mesh network throughout the downtown and points of interest. After 22 weeks of initial testing, we have experienced over 3800 unique users who downloaded over 650GB of information. The reason I mention this point is that The City of Prestonsburg has experienced significant growth. In a period of 45 days after the initial announcement, we were able to attract twenty new business and create 43 new jobs. Our year-over-year general revenues increased by \$111,410. Whether directly or indirectly, I attribute our growth to hard work, recruitment, and proper infrastructure such as our wireless mesh system. When citizens have improved access to information and technology, you will see a better and healthier community than before. Our goal is progress, not profit.

Our city is not unique. As technology improves and products become faster, better, and cheaper, the common consumer will take advantage of it. Whether it is a company like Meraki Networks or current providers like AT&T, Verizon or other municipal utilities, it is up to individuals to compete in the marketplace and to make their product or service the most innovative and not the most exclusive. This country has been served well by its innovation and it is up to programs like ConnectKentucky and Connected Nation to keep America strong and growing.

Sincerely,

Brent Graden
City of Prestonsburg

July 8, 2008

Dear Chairman Martin:

I write to urge you to consider a cooperative, public-private approach to mapping national broadband availability.

As director of the Green River Area Development District (GRADD) in western Kentucky, I have been part of a remarkable regional project that is now culminating in a broadband wireless network that spans seven rural counties – an area roughly the size of Delaware. This project, named ConnectGRADD, is led by the seven county judge executives of the region, and was undertaken to help bridge the urban-rural digital divide by expanding affordable, high-speed broadband access to our rural residents.

Chip Spann, and other staff members from ConnectKentucky, provided valuable assistance in helping us develop an RFP for network construction and service provision. Mr. Spann served on a local committee that made the recommendation to our Selection Committee; his knowledge of wireless technology was invaluable in providing the local Judge Executives a level of confidence in the winning proposal. Ultimately the winning bid came from a collaborative effort between Digital Connections Inc (DCI) and Cinergy Communications. Mr. Spann continued to consult during the contract negotiations with the winning bidders.

As you and your colleagues at the FCC work to develop national broadband policies, I encourage you to find creative ways that you could use the ConnectKentucky model.

Thank you for your work to ensure all Americans have access to broadband. I believe that ConnectGRADD proves that this goal is possible, if we work together to make it happen.

Respectfully,

Jiten Shah
Executive Director

Green River Area Development District

cc:

Commissioner Jonathan Adelstein

Commissioner Michael Copps

Commissioner Robert McDowell

Commissioner Deborah Tate

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Received & Inspected

AUG 12 2008

FCC Mail Room

July 25, 2008

Ms. Marlene H. Dortch
Secretary, Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

ORIGINAL

Re: **Notice of Ex Parte Communication**

Notice of Ex Parte Communication in the Matter of WC Docket 07-38 (Broadband Data Collection)

Dear Ms. Dortch,

Today I sent the attached letter to Chairman Kevin J. Martin with copies to Commissioner Michael J. Copps, Commissioner Jonathan S. Adelstein, Commissioner Deborah Taylor Tate, and Commissioner Robert M. McDowell.

Sincerely,



Mark David Goss
Kentucky Public Service Commission Chairman, 2004 - 2008

No. of Copies rec'd _____
List ABCDE _____

July 25, 2008

Received & Inspected

Chairman Kevin J. Martin
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

AUG 12 2008

FCC Mail Room

Dear Chairman Martin:

From 2004 through the first half of 2008, I was honored to serve as chairman of the Kentucky Public Service Commission. It was during this period that the public-private partnership of ConnectKentucky initiated its statewide program to expand broadband availability and adoption.

My primary goal as chairman of the Kentucky PSC during these last four years was to enable policies that would effectuate the highest quality services for all Kentucky consumers. One of our most innovative and successful means for achieving this end proved to be ConnectKentucky.

The most visible and talked-about element of the ConnectKentucky initiative is its effective broadband mapping process, and it is understandable that both the Federal Communications Commission and Congress are seeking methods to build upon this program and the many success stories generated in communities across the Commonwealth as a result of ConnectKentucky's work.

ConnectKentucky's mapping effort was preceded by years of research and discussions with state agencies, local officials, economic development organizations, business leaders, consumers, and broadband providers. Their statistical surveys and this constructive dialogue culminated in a collaborative approach to broadband expansion which has been broadly supported by Kentucky government at all levels.

Because the state of Kentucky has been such a leader in smart broadband policy that tackles both broadband access and adoption, I believe it is critical for the rest of the nation to learn from our experiences and our work that began under Democratic Governor Paul Patton, continued under Republican Governor Ernie Fletcher, and fortunately for the citizens and businesses of Kentucky, is continuing today under the leadership of Democratic Governor Steve Beshear.

Perhaps what is most remarkable for the state of Kentucky is that we have been able to overcome politics and come together across multiple administrations to enable progressive action for Kentucky consumers. We have worked together in a bi-partisan way, and we have learned as we go, working in cooperative ways that some said would never work. Of course, there will always be those few politically motivated voices that still try to hold fast to the claim that this cooperative method is not the right way. There are those who will claim that ConnectKentucky is a front for broadband providers and that all data – regardless of how proprietary and regardless of how its release could negatively impact consumers – should be made transparent on every level. But I urge caution in your assessment of these arguments, and I encourage you to take a close look at the hard evidence that clearly demonstrates the tremendous impact of the cooperative ConnectKentucky approach, and the potential impact of this approach for all Americans.

There are several elements to this collaborative, public-private approach that make it work so well. One element is ConnectKentucky's interactive broadband map, which serves as the foundational tool for the rest of the ConnectKentucky program. The web-based format of the map allows any Kentucky consumer to enter his or her address and receive a list of broadband providers serving that address, along with a hyperlink to each provider's website. The interactive format allows consumers, policymakers, economic developers, prospective businesses, or anyone else to drill down to any neighborhood or street and clearly see the different types of broadband technologies available.

Although some will argue that heavy regulation is necessary for accurate and transparent data, ConnectKentucky has proven that the data obtained through a collaborative approach is much more accurate than what could be achieved through government regulation. And ironically, the public-private partnership structure itself enables a much greater level of transparency than what government could provide to consumers. It is critical to remember that the preliminary technical network data that ConnectKentucky originally receives from broadband providers is meaningless to consumers. The real value in ConnectKentucky's mapping program is not even that it gets around the proprietary issues involved with the provider data, but rather in ConnectKentucky's work in the field with broadband providers to gather the data necessary for the map, then translate it into GIS format, and finally represent the data in the most public and transparent of formats so that the consumer can be the ultimate judge of the data.

In fact, one of the reasons the ConnectKentucky map is so effective for consumers is that there are extensive and readily accessible processes in place for consumers to "check" the maps and notify ConnectKentucky if there are errors in the data. Because the Kentucky Public Service Commission retains legislative authority to investigate and resolve consumer complaints, ConnectKentucky's sophisticated process of consumer verification of the broadband maps has been a tremendous help to the Kentucky Commission. While the Kentucky Commission fields around 100 calls per year from consumers who want to help correct the map or who want broadband and can't get it, ConnectKentucky fields hundreds of calls each month from these same consumers, and this verification system results in a map of broadband availability that is open-access with interactive data that is readily verifiable for *consumers themselves*.

Indeed, the Kentucky Public Service Commission filed comments in this proceeding calling for data that is "readily verifiable and subject to independent scrutiny and analysis." Fortunately, the ConnectKentucky maps have just such a system in place. Meanwhile, the underlying proprietary infrastructure data – which would be meaningless for verification purposes but potentially very harmful to consumers – is protected. As a result, consumers themselves have a direct route to verify the broadband data.

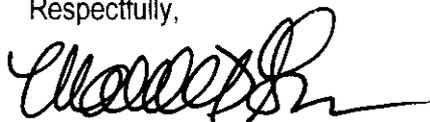
The rest of the story comes with how this dynamic and evolving broadband map is actually used and continually updated in Kentucky's communities. Local leaders across the state work hand-in-hand with ConnectKentucky technicians in the field to develop local teams for actionable technology growth across all sectors of the community – healthcare, education, government, business, and others. The result is a statewide movement of community-specific solutions to bridge the digital divide. One of the more prominent programs borne from this movement is No Child Left Offline – which began as a partnership between private sector donors and the state of Kentucky to refurbish state computers and place these computers in the homes of Kentucky's low-

income children. No Child Left Offline has now expanded into other states and is delivering new computers to thousands of underprivileged children who would otherwise grow up without technology access at home.

As you work toward progressive solutions for America's consumers, I encourage you to look closely at the ConnectKentucky program to understand its bold and solutions-based approach that works for the benefit of consumers. There will be a select few politically-driven and self-interested voices who will argue that state-based public private partnerships are not the best solution for America, but there are thousands of Kentuckians who would strongly disagree. They include the local officials in towns throughout Kentucky who worked directly with ConnectKentucky to develop creative solutions to fill the broadband gaps. They also include the many small, local broadband providers who have worked directly with ConnectKentucky to offer these creative solutions. And of course, they include the thousands of consumers in rural homes across the state who are now part of the Internet Age as a result of ConnectKentucky.

This public-private approach holds the potential for effectively mapping national broadband availability, while simultaneously establishing a monumental grassroots campaign for using these maps to fill America's broadband gaps. The Federal Communications Commission has a great opportunity before it to act in a progressive way for all Americans. I encourage you to make the most of Kentucky's experience, and establish a national broadband policy built on public-private partnerships.

Respectfully,



Mark David Goss
Kentucky Public Service Commission Chairman, 2004 - 2008

cc:

Commissioner Michael J. Copps
Commissioner Jonathan S. Adelstein
Commissioner Deborah Taylor Tate
Commissioner Robert M. McDowell



**CONNECTED
NATION.**

Volunteer Mapping Partners

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ACE TELEPHONE
ACSinc
ALBANY MUTUAL TELEPHONE ASSOCIATION
ALLIANCE COMMUNICATIONS
ALTIUS BROADBAND
AMPLEX WIRELESS
APPALACHIAN WIRELESS
ARCADIA TELEPHONE COMPANY (TDS TELECOM)
ARDMORE TELEPHONE COMPANY
ARMSTRONG
ARMSTRONG UTILITIES
ARTHUR MUTUAL TELEPHONE COMPANY
ARVIG COMMUNICATION SYSTEMS
AT&T
AT&T MOBILE
AT&T WIRELESS
ATLANTIC BROADBAND
AYERSVILLE (OH) TELEPHONE COMPANY
BALLARD (KY) RURAL TELEPHONE COOPERATIVE
BARBOURVILLE (KY) UTILITY COMMISSION
BARDSTOWN (KY) MUNICIPAL UTILITIES
BARNESVILLE (MN) MUNICIPAL TELEPHONE COMPANY
BASCOM MUTUAL TELEPHONE COMPANY
BEN LOMAND RURAL TELEPHONE COOPERATIVE, INC.
BENTON (MN) COOPERATIVE TELEPHONE COMPANY
BENTON COUNTY (TN) CABLE
BENTON RIDGE (OH) TELEPHONE COMPANY
BERKELEY CABLE TV
BEVCOMM
BIG SANDY TV CABLE
BLACKDUCK TELEPHONE COMPANY
BLEDSOE TELEPHONE COOPERATIVE CORPORATION

BLUE EARTH VALLEY TELEPHONE
BLUEONE.NET - PENDLETON COUNTY
BLUFFTON TELEPHONE COMPANY
BOWLING GREEN MUNICIPAL UTILITIES
BRADLEY'S INC.
BRANDENBURG TELEPHONE COMPANY
BRIDGEWATER TELEPHONE COMPANY
BRIGHT NET NORTH
BRIGHT.NET INTERNET SERVICES
BRISTOL TENNESSEE ESSENTIAL SERVICES
BROADBAND CORP
BROWNS VALLEY TELEPHONE
BUCKEYE CABLEVISION
BUCKLAND TELEPHONE COMPANY
BURGIN WIRELESS
CABLE ONE
CAINPRO COMMUNICATIONS
CALLAWAY TELEPHONE COMPANY
CANNON VALLEY TELECOM
CAS CABLE
CEBRIDGE CONNECTIONS
CELERITY NETWORKS
CELINA CABLE
CENTURY TELEPHONE
CHAMPAIGN TELEPHONE COMPANY
CHAPEL COMMUNICATIONS
CHARTER COMMUNICATIONS
CHATTANOOGA (TN) ELECTRIC POWER BOARD
CHESNEE
CHRISTENSEN COMMUNICATIONS COMPANY
CINCINNATI BELL TELEPHONE COMPANY
CINERGY COMMUNICATIONS
CITY OF BAGLEY (MN)
CITY OF BARNESVILLE (MN)
CITY OF BELLEFONTE (KY)
CITY OF BOYD (MN)
CITY OF RACELAND (KY)
CLARKSVILLE (TN) DEPARTMENT OF ELECTRICITY
CLEARWIRE
COALFIELDS TELEPHONE
COLANE CABLE
COLUMBIA POWER AND WATER SYSTEMS
COLUMBUS GROVE TELEPHONE COMPANY (FAIRPOINT
COMMUNICATIONS)
COMCAST
COMCAST CABLE

COMCAST COMMUNICATIONS
COMCAST CORPORATION
COMMUNICOMM
COMPORIUM COMMUNICATIONS
COMPUTERS 4 U
CONCORD TELEPHONE EXCHANGE (TDS TELECOM)
CONNEAUT TELEPHONE COMPANY
CONNECTLINK
CONSOLIDATED TELEPHONE COMPANY
CONTINENTAL TELEPHONE COMPANY (TDS TELECOM)
COUNTRY CONNECTIONS
COX CABLE
CROCKETT TELEPHONE COMPANY (TEC)
CROSSLAKE COMMUNICATIONS
DIVERSICOM
DM BROADBAND
DOTSPOT WIRELESS
DOYLESTOWN TELEPHONE
DTC COMMUNICATIONS
DUNNELL TELEPHONE COMPANY
DUO COUNTY (KY) TELECOM
DUO COUNTY (KY) TELEPHONE COOPERATIVE CORPORATION
EAGLE VALLEY TELEPHONE COMPANY
EAST OTTER TAIL TELEPHONE COMPANY
EASTON TELEPHONE COMPANY
ECKELS TELEPHONE COMPANY
ECSIS.NET
ELECTRONIC SOLUTIONS
ELLIJAY TELEPHONE COMPANY (ETC)
EMBARQ
EMILY COOPERATIVE TELEPHONE COMPANY
EN-TEL COMMUNICATIONS
ENVENTIS
ERIE COUNTY CABLEVISION
EVERTEK WIRELESS
FAMILY VIEW CABLEVISION
FARMERS MUTUAL TELEPHONE COMPANY
FARMERS TELEPHONE COOPERATIVE
FAYETTEVILLE (TN) PUBLIC UTILITIES
FEDERATED TELEPHONE COOPERATIVE
FELTON TELEPHONE COMPANY
FOOTHILLS RURAL TELEPHONE COOPERATIVE CORPORATION
FORT JENNINGS (OH) TELEPHONE COMPANY
FRANKFORT (KY) ELECTRIC & WATER PLANT BOARD
FRONTIER
FRONTIER COMMUNICATIONS

GALAXY CABLEVISION
GARDEN VALLEY TELEPHONE COMPANY
GARDONVILLE COOPERATIVE TELEPHONE ASSOCIATION
GERMANTOWN INDEPENDENT TELEPHONE COMPANY
(FAIRPOINT COMMUNICATIONS)
GLANDORF TELEPHONE COMPANY
GMN WIRELESS BROADBAND
GRANADA TELEPHONE COMPANY
HALSTAD TELEPHONE COMPANY
HARDY TELECOMMUNICATIONS
HARGRAY
HARLAN COMMUNITY TV
HARMONY TELEPHONE COMPANY
HECTOR COMMUNICATIONS
HENDERSON MUNICIPAL POWER & LIGHT COMPANY
HICKORYTECH
HIGHLAND TELEPHONE COOPERATIVE, INC.
HILLS TELEPHONE COMPANY
HOME TELEPHONE COMPANY
HOPKINSVILLE (KY) ELECTRIC SYSTEM
HORIZON
HORRY TELEPHONE COOPERATIVE
HUMPHREYS COUNTY TELEPHONE COMPANY (TDS TELECOM)
GERMANTOWN INDEPENDENT TELEPHONE COMPANY
(FAIRPOINT COMMUNICATIONS)
GLANDORF TELEPHONE COMPANY
GMN WIRELESS BROADBAND
GRANADA TELEPHONE COMPANY
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HIGHLAND TELEPHONE COOPERATIVE, INC.
HILLS TELEPHONE COMPANY
HOME TELEPHONE COMPANY
HOPKINSVILLE (KY) ELECTRIC SYSTEM
HORIZON
HORRY TELEPHONE COOPERATIVE
HUMPHREYS COUNTY TELEPHONE COMPANY (TDS TELECOM)
KYWIMAX
LAKEDALE COMMUNICATIONS
LARSON UTILITIES

LESLIE COUNTY (KY) TELEPHONE
LEWISPORT TELEPHONE COMPANY
LIBERTY COMMUNICATIONS, INC
LIMESTONE CABLE VISION
LITTLE MIAMI TELEPHONE COMPANY (TDS TELECOM)
LOGAN (KY) TELEPHONE COOPERATIVE
LONSDALE TELEPHONE COMPANY
LORETEL SYSTEMS
LORETTO TELEPHONE
LYCOM
MABEL COOPERATIVE TELEPHONE COMPANY
MAINSTREET COMMUNICATIONS
MANCHESTER-HARTLAND TELEPHONE COMPANY
MANKATO CITIZENS TELEPHONE COMPANY
MASSILLON CABLE
MAYFIELD (KY) ELECTRIC AND WATER SYSTEMS
MCCLURE TELEPHONE COMPANY
MECHCOM DOT NET
MEDIACOM
MEGA-WI
MELROSE TELEPHONE COMPANY
MID-COMMUNICATIONS
MIDCONTINENT COMMUNICATIONS
MIDDLE POINT HOME TELEPHONE COMPANY
MID-STATE TELEPHONE COMPANY
MIDWEST TELEPHONE COMPANY
MIKULSKI COMMUNICATIONS
MILLINGTON (TN) CABLE TV
MILLINGTON (TN) TELEPHONE COMPANY
MINFORD TELEPHONE COMPANY
MINNESOTA LAKE TELEPHONE COMPANY
MINNESOTA VALLEY TELEPHONE COMPANY
MINN-KOTA AG WIRELESS
MONTICELLO (KY) PLANT BOARD
MORRISTOWN (TN) UTILITY SYSTEMS
MOUNTAIN TELEPHONE COOPERATIVE
MVTV WIRELESS
NET EXPRESS
NETPOWER, LLC
NEW ERA BROADBAND SERVICES
NEW KNOXVILLE (OH) TELEPHONE COMPANY
NEWWAVE COMMUNICATIONS
NEXGENACCESS
NEXGENACCESS WIRELESS
NORTH CENTRAL TELEPHONE COOPERATIVE CORPORATION
NORTH COAST WIRELESS

NORTHLAND CABLE
NORTHSTAR ACCESS
NOVA TELEPHONE COMPANY
NU-TELECOM
OAKWOOD TELEPHONE COMPANY (TDS TELECOM)
OHIO COUNTY (KY) DIRECT NET
ORWELL COMMUNICATIONS (FAIRPOINT COMMUNICATIONS)
OSAKIS TELEPHONE COMPANY
OTTER TAIL TELECOM
OTTOVILLE MUTUAL TELEPHONE COMPANY
OWENSBORO (KY) MUNICIPAL UTILITIES
PALMETTO RURAL TELEPHONE COOPERATIVE
PARK REGION MUTUAL TELEPHONE COMPANY
PATTERSONVILLE TELEPHONE COMPANY
PAUL BUNYAN RURAL TELEPHONE COOP
PBT TELECOM
PEE DEE ONLINE
PEOPLES RURAL TELEPHONE COOPERATIVE CORPORATION
PEOPLE'S TELEPHONE (TEC)
PEOPLES TELEPHONE COMPANY
PERSONALLY COMPLETE
PHILIPPI (WV) MUNICIPAL BUILDING COMMISSION
PIEDMONT RURAL TELEPHONE COOPERATIVE
PINE ISLAND TELEPHONE COMPANY
PLANET CONNECT
PRINCETON (KY) ELECTRIC AND PLANT BOARD
PRITCHTECH
PULASKI (TN) ELECTRIC SYSTEM
QUICK RELAY
QWEST CORPORATION
RAPID CABLE
RED RIVER RURAL TELEPHONE ASSOCIATION
REDBIRD WIRELESS
RED'S TV CABLE, INC.
RIDGEVILLE TELEPHONE COMPANY
RIVERSIDE COMMUNICATIONS
ROTHSAY TELEPHONE COMPANY
RUNESTONE TELEPHONE ASSOCIATION
RURALNET
RUSSELLVILLE (KY) ELECTIRC PLANT BOARD
SAA BRIGHT.NET
SALEM TELEPHONE COMPANY
SANDHILL TELEPHONE
SAVAGE COMMUNICATIONS
SCIOTOWIRELESS
SCS WIRELESS

SHEEHAN GAS
SHELBY WIRELESS
SHERBURNE COUNTY TELEPHONE COMPANY
SHERWOOD MUTUAL TELEPHONE ASSOCIATION
SIOUX VALLEY WIRELESS
SIT-CO (FORMERLY OHIO VALLEY WIRELESS)
SJOBERG'S CABLE INC.
SKYLINE TELEPHONE COOPERATIVE, INC.
SLEEPY EYE TELEPHONE COMPANY
SOFTEK
SOUTH CENTRAL RURAL TELEPHONE COOPERATIVE CORPORATION
SOUTHEAST TELEPHONE
SOUTHERN COASTAL CABLE
SPEEDBEAM
SPRING GROVE COOPERATIVE TELEPHONE COMPANY
SPRINT
SSINET
STRATUS WAVE COMMUNICATIONS
SUDDENLINK COMMUNICATIONS
SUNLIT SURF
SURFMORE.NET
SURRY TELEPHONE MEMBERSHIP CORP.
SYCAMORE TELEPHONE COMPANY
TDS TELECOM
TELEPHONE SERVICE COMPANY
TELLICO TELEPHONE COMPANY (TDS TELECOM)
TENNESSEE TELEPHONE COMPANY (TDS TELECOM)
THACKER-GRISBY TELEPHONE COMPANY
TIME WARNER CABLE
TRENTON TV CABLE COMPANY
TRU VISTA
TULLAHOMA UTILITIES BOARD
TV SERVICE & UNITED CABLE
TWIN LAKES TELEPHONE COOPERATIVE CORPORATION
TWIN VALLEY-ULEN TELEPHONE COMPANY
ULTRANET
UNITED TELEPHONE COMPANY
UN-WIREDWEB
US CABLE
US DIGITAL ONLINE
US INTERNET
VALLEY TELEPHONE COMPANY
VANLUE TELEPHONE COMPANY (TDS TELECOM)
VAUGHNSVILLE (OH) TELEPHONE COMPANY
VERIZON
VORTEX WIRELESS

VVDS
WABASH MUTUAL TELEPHONE COMPANY
WAR TELEPHONE COMPANY
WATCH TV
WEST CAROLINA RURAL TELEPHONE COOPERATIVE
WEST CENTRAL TELEPHONE ASSOCIATION
WEST KENTUCKY NETWORKS
WEST KENTUCKY RURAL TELEPHONE COOPERATIVE CORPORATION
WEST TENNESSEE TELEPHONE COMPANY (TEC)
WESTERN TELEPHONE
WESTSIDE NORTH
WIDE OPEN WEST (WOW)
WILLIAMSTOWN (KY) CABLE AND INTERNET SERVICE
WIMAX EXPRESS
WINDOM TELECOMMUNICATIONS
WINDSTREAM
WINNEBAGO COOPERATIVE TELPHONE ASSOCIATION
WINSTED TELEPHONE COMPANY
WINTHROP
WISPER WIRELESS
WOODSTOCK TELEPHONE COMPANY
WORLDWIDE GAP
XTN
XXPANSION NETWORKS
YADKIN VALLEY TELEPHONE MEMBERSHIP CORP.



**United States House of Representatives
Committee on Energy and Commerce
Subcommittee on Communications,
Technology, and the Internet**

**“Oversight of the American Recovery and
Reinvestment Act”**

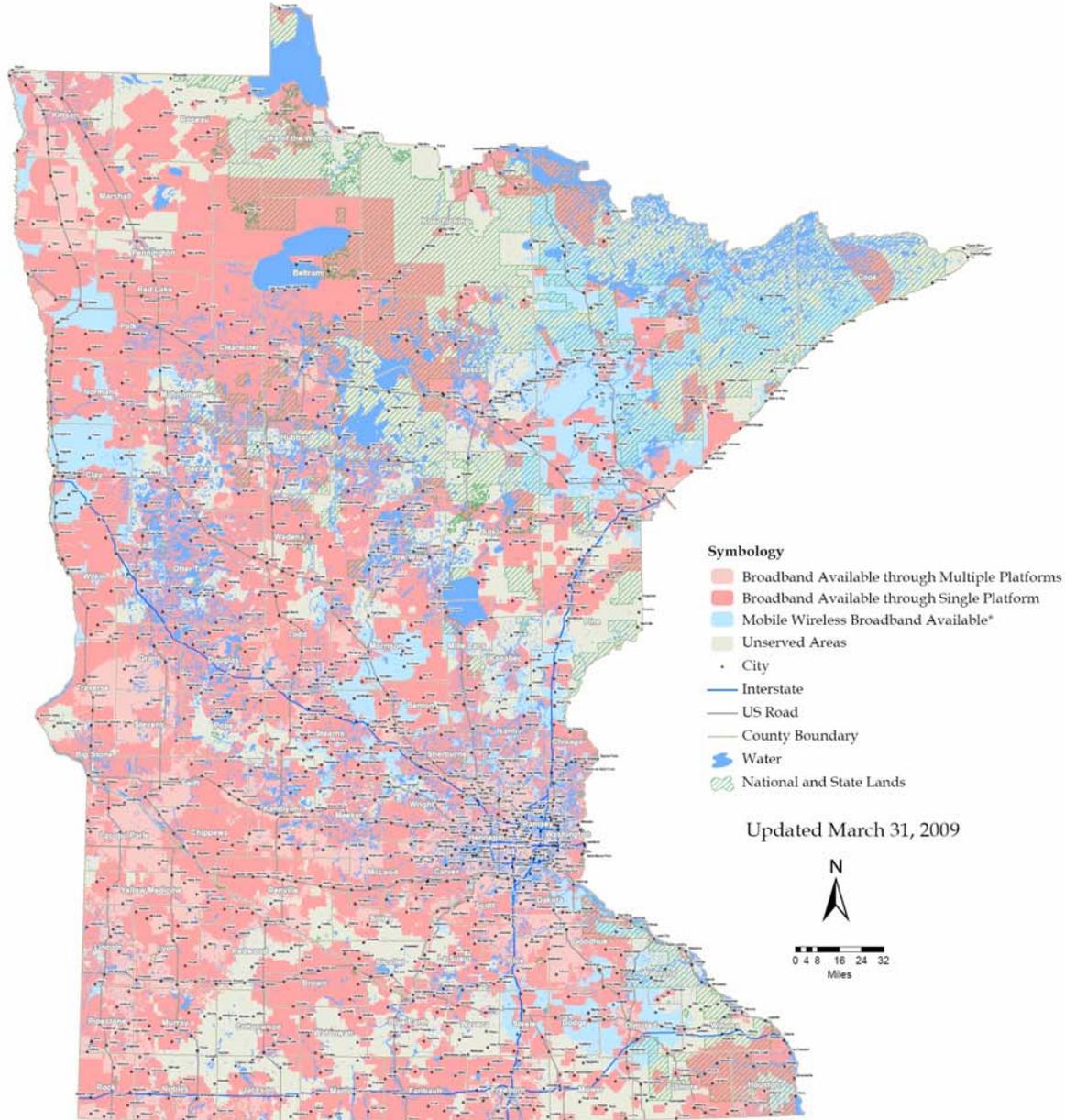
April 2, 2009

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Minnesota Broadband Service Inventory

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This map does not depict satellite broadband service.

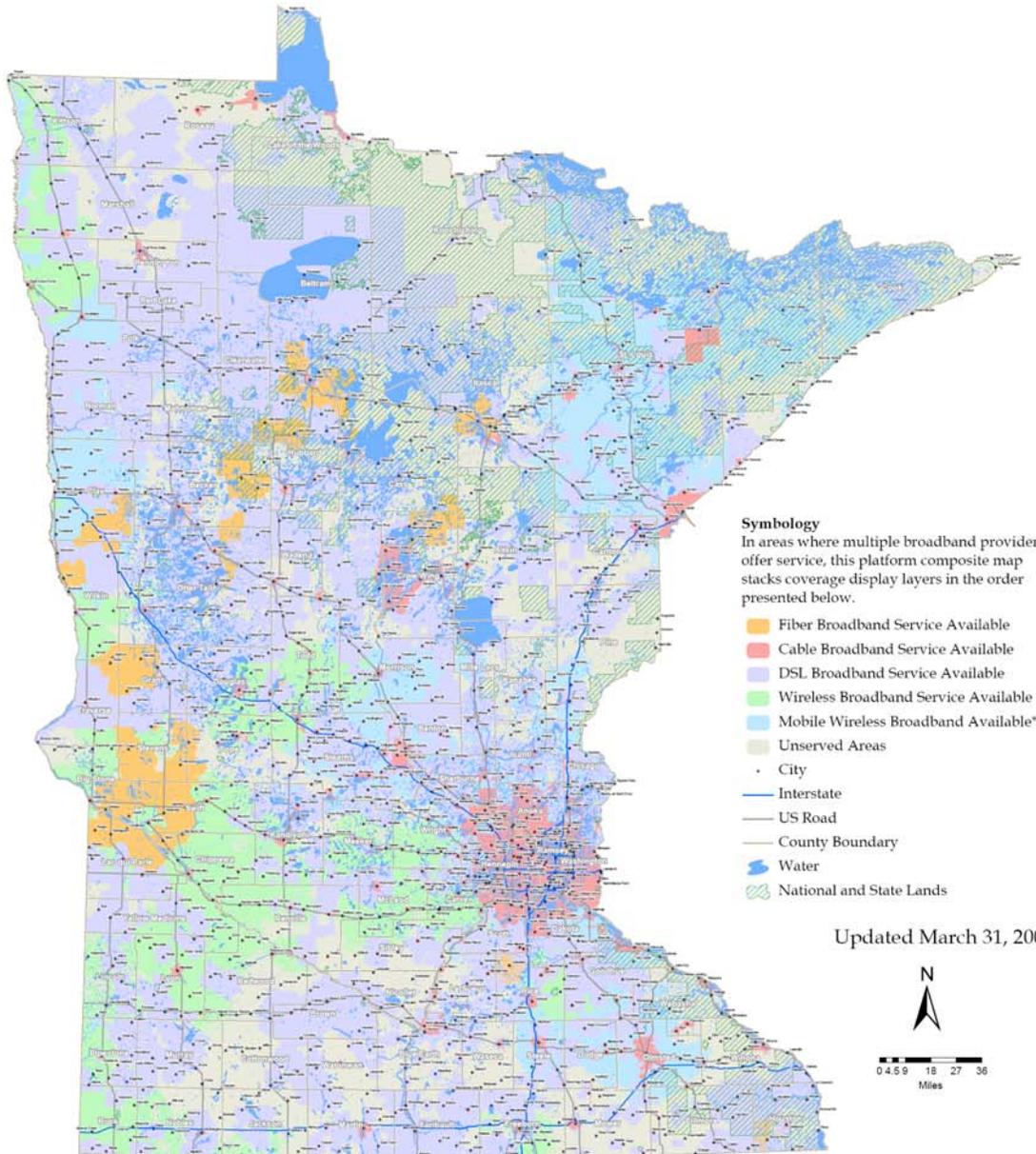
*This map is not a guarantee of coverage, contains areas of no service, and generally predicts where outdoor coverage is available. Equipment, topography, and environment affect service.

Connect Minnesota has worked with broadband providers throughout the State to identify the gaps in broadband service - the first step in a statewide effort to "fill the gaps" for 100% broadband availability.

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Minnesota Broadband Service Inventory

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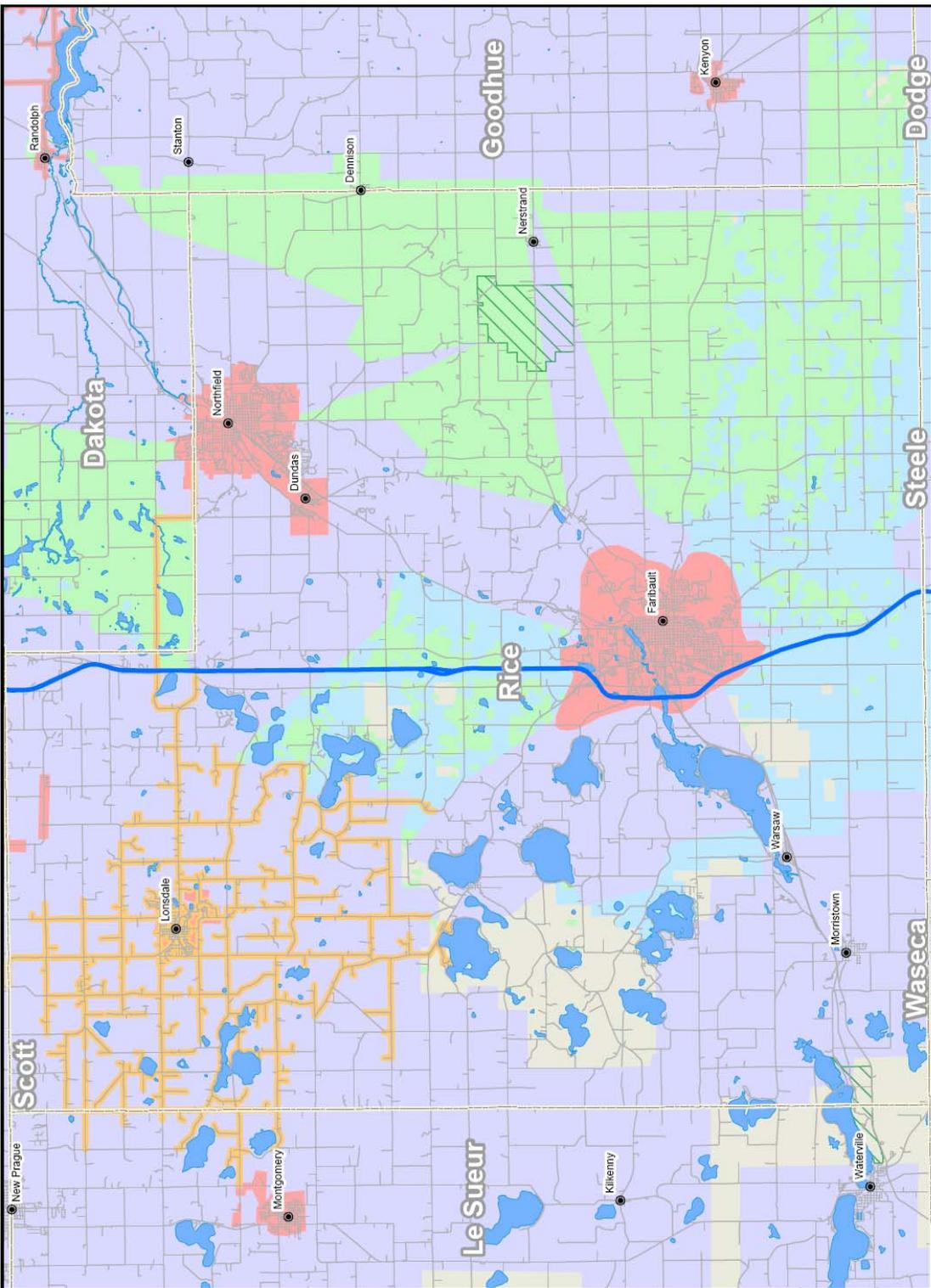
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Broadband Service Inventory
Rice
Minnesota
 Updated March 31, 2009
maptools.mnconnect.org



This map does not depict satellite broadband services. It only shows the availability of terrestrial broadband services, and does not include services that are not available in the area. Equipment, type, speed, and investment affect service. The representation contained here is for informational purposes only and does not constitute a warranty, representation, or agreement of any kind. The information is provided as a service to the public and is not intended to be used for any other purpose. The information is provided as a service to the public and is not intended to be used for any other purpose. The information is provided as a service to the public and is not intended to be used for any other purpose.

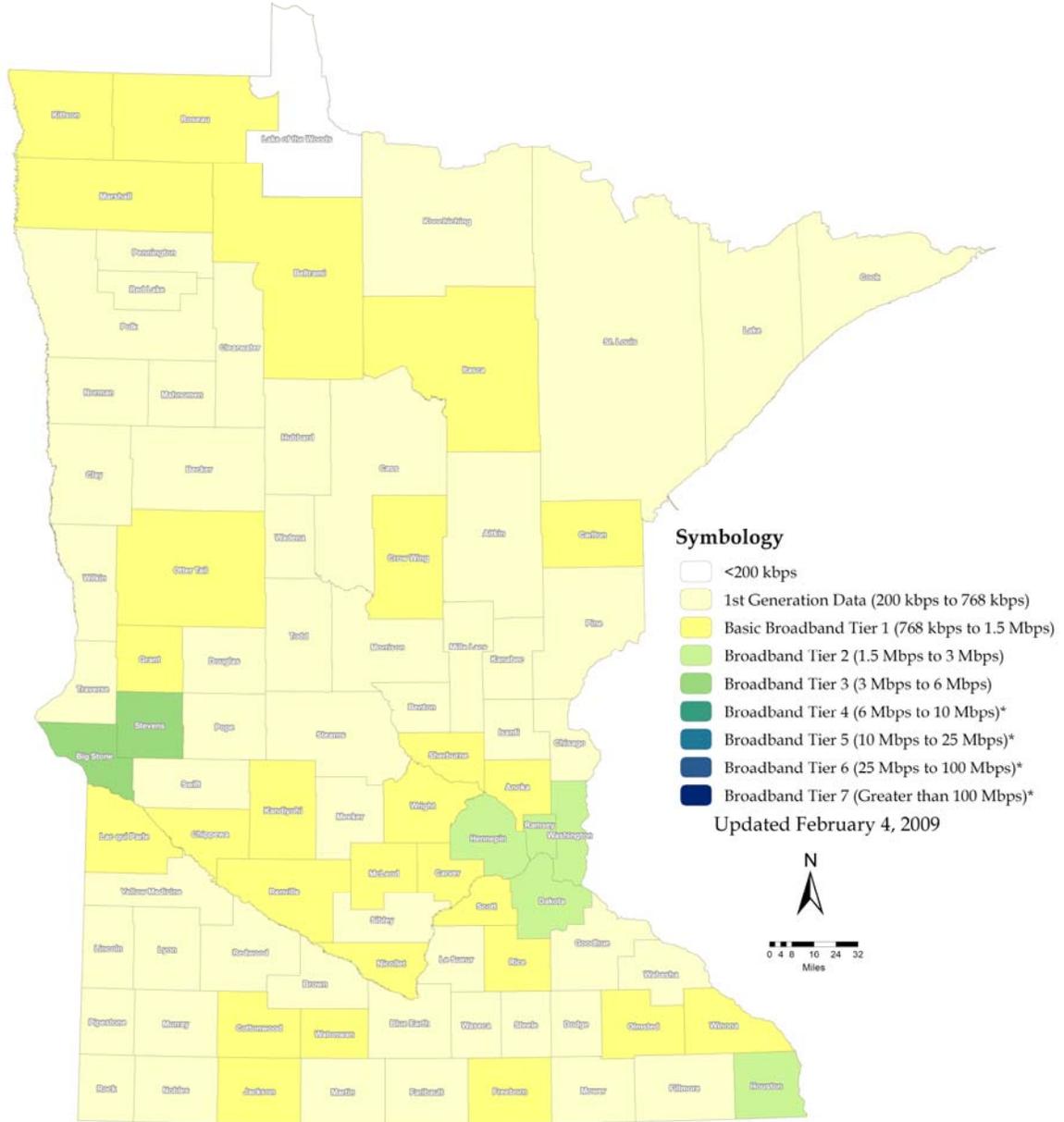


- Symbology**
 In areas where multiple broadband providers offer service, this platform composite map stacks coverage display layers in the order presented below.
- Fiber Broadband Service Available
 - Cable Broadband Service Available
 - DSL Broadband Service Available
 - Wireless Broadband Service Available
 - Mobile Wireless Broadband Available
 - Unserviced Areas
 - City
 - Interstate
 - US Road
 - Local Road
 - County Boundary
 - Water
 - National and State Lands

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Minnesota Average Residential Upload Speed

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Speed maps are based on an aggregation of data transmission speeds gathered from a sampling of consumers volunteering to utilize online speed testing tools.

Download and upload speeds can be affected by network congestion along the entire path of the test, shared connections at the end user's location, and/or potential hardware limitations on the tested computer. Speed maps are not a depiction of broadband availability or adoption, nor are they necessarily an indicator of the available bandwidth within a given geographic area.

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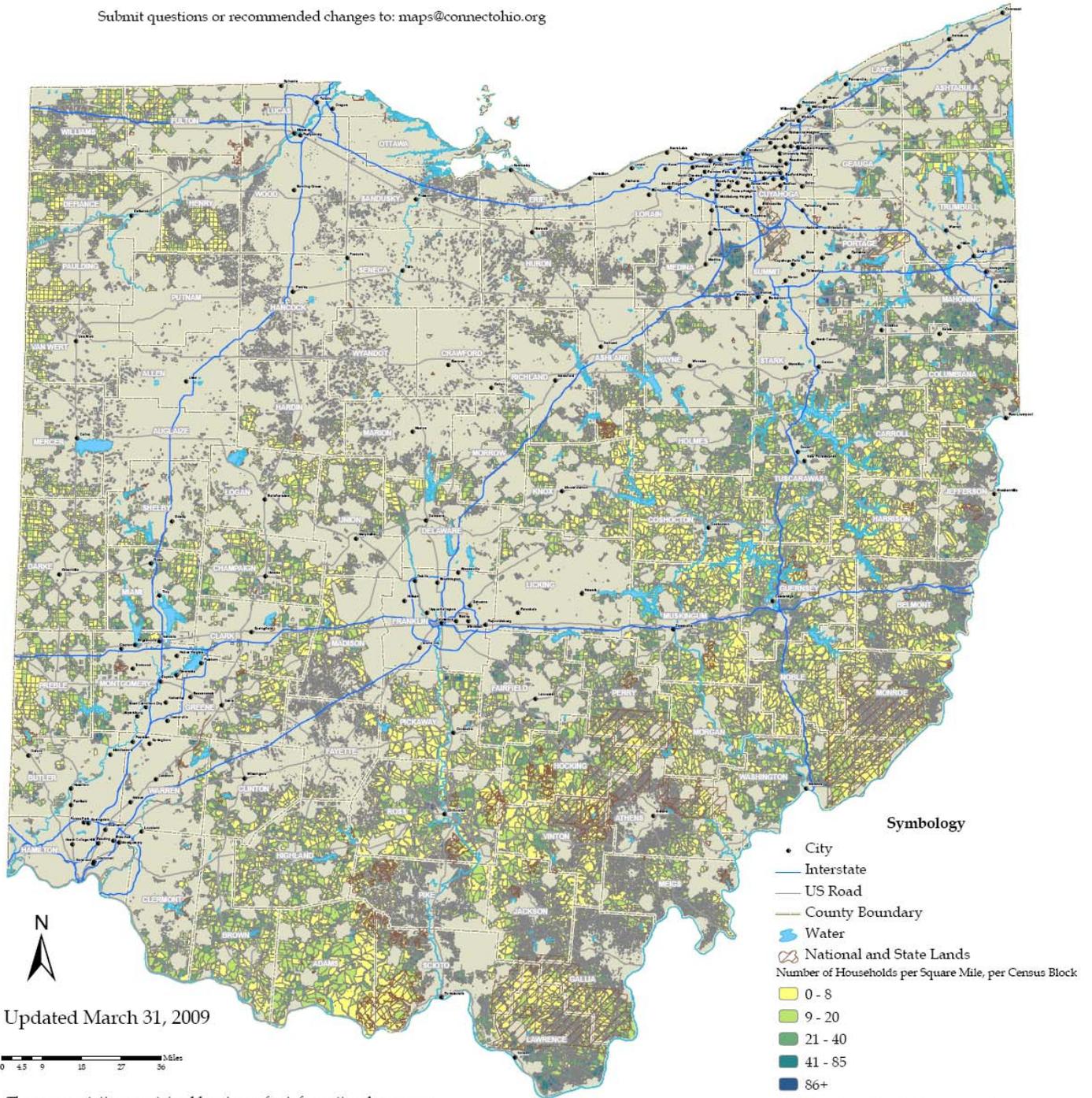
*County Average Not Represented in This Tier.

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Density of Households Unserved by a Broadband Provider by Census Block



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Updated March 31, 2009

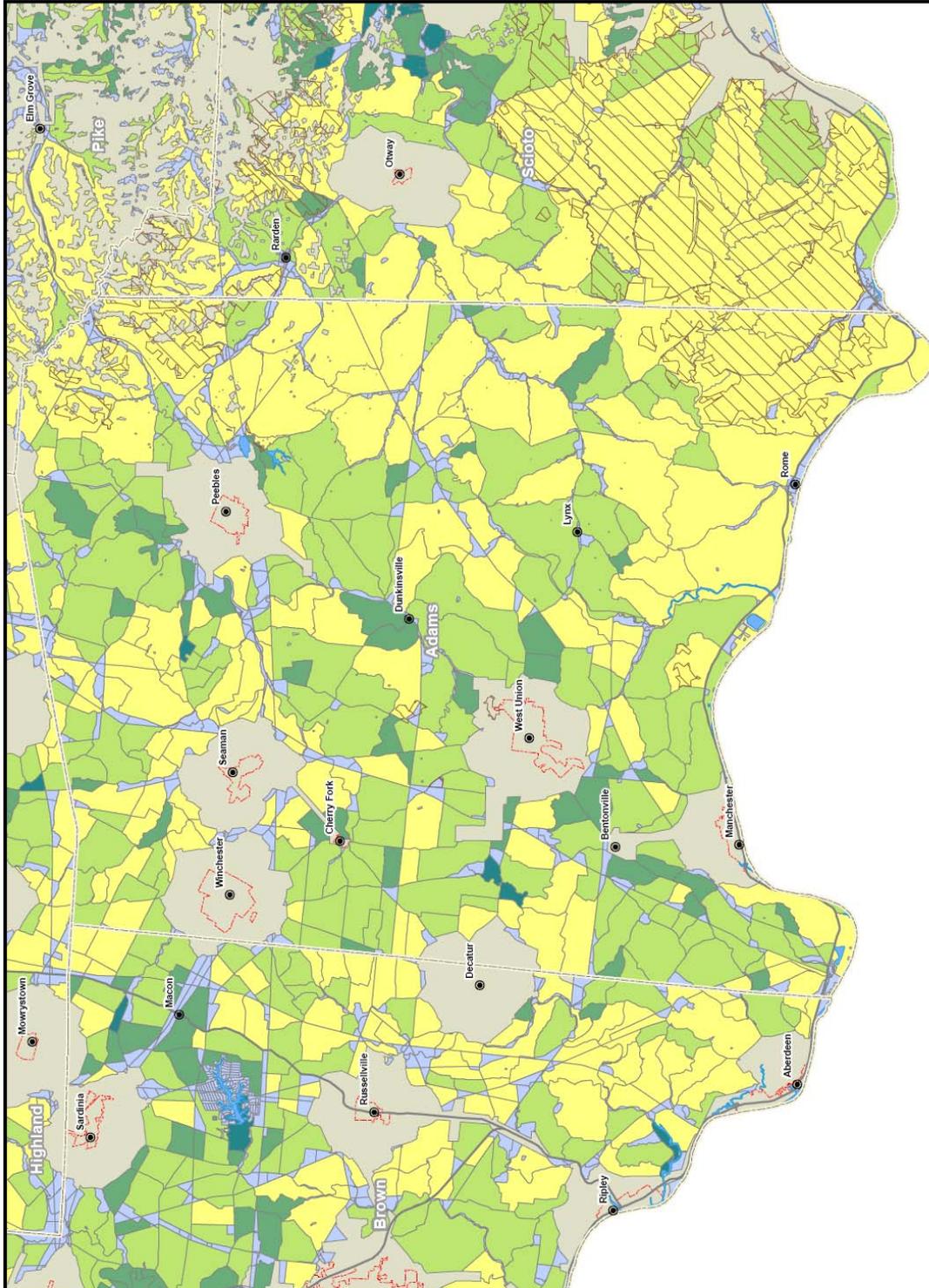


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**Density of Households
Unserved by a
Broadband Provider
By Census Block
Adams County
Ohio**

Updated March 31, 2009
 Submit questions or recommended changes to:
maps@connectohio.org

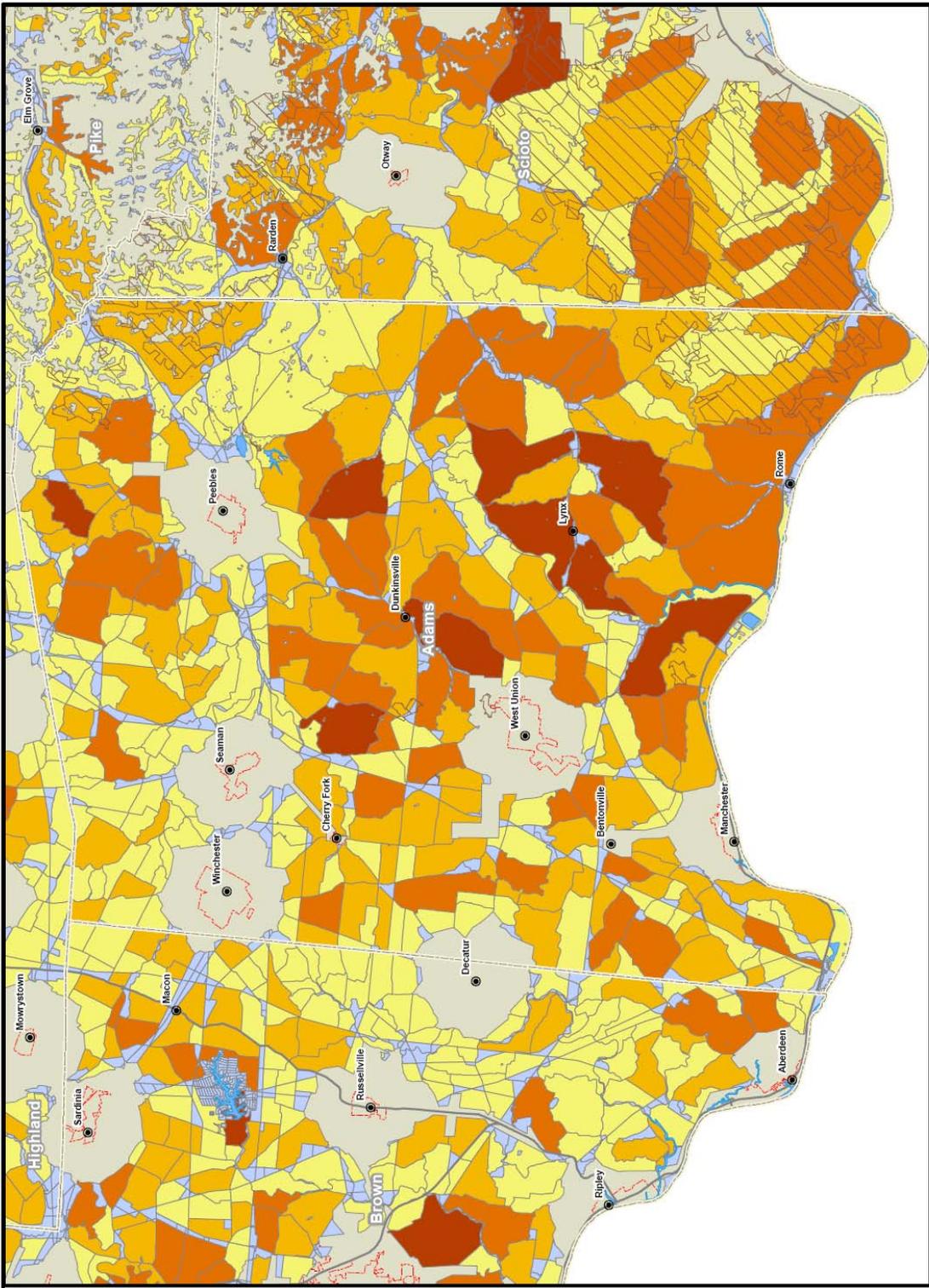


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- 0 0.5 1 2 3 Miles
- Symbology**
- City
 - Interstate
 - US Road
 - County Boundary
 - Municipal Boundary
 - Water
 - National Lands

- Number of Unserved Households per Square Mile, per Census Block**
- 0 - 8
 - 9 - 20
 - 21 - 40
 - 41 - 85
 - 86+
- Area less than 0.25 square mile
 Broadband Available*
- *Broadband service is not included in broadband availability.



**Number of Households
Unserved by a
Broadband Provider
By Census Block
Adams County
Ohio**

Updated March 31, 2009
 Submit questions or recommended changes to:
mapinfo@connectohio.org



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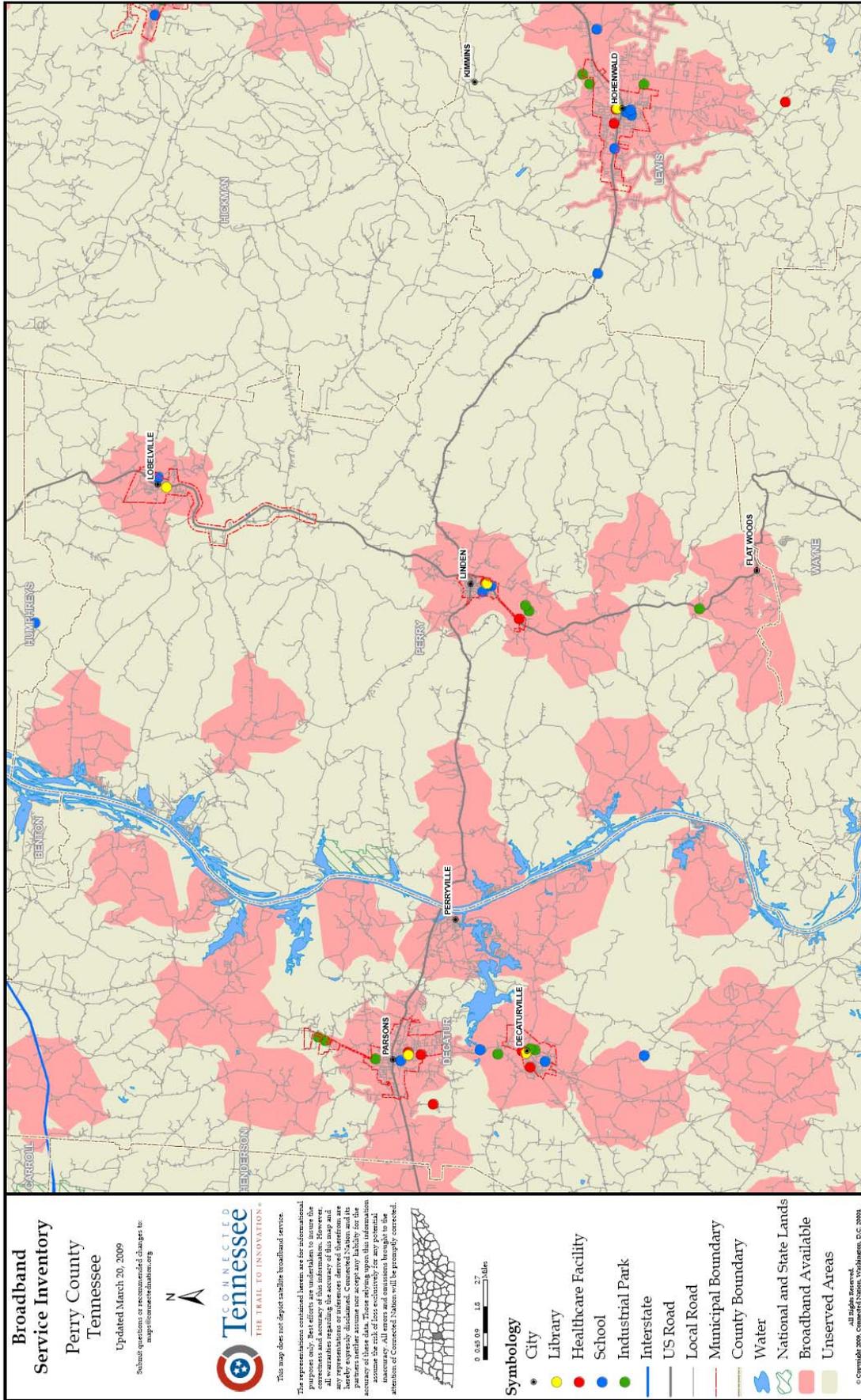
- Symbology**
- City
 - Interstate
 - US Road
 - County Boundary
 - Municipal Boundary
 - Water
 - National Lands

Number of Unserved Households per Census Block

0 - 10.9	51 - 100.9
11 - 25.9	101+
26 - 50.9	

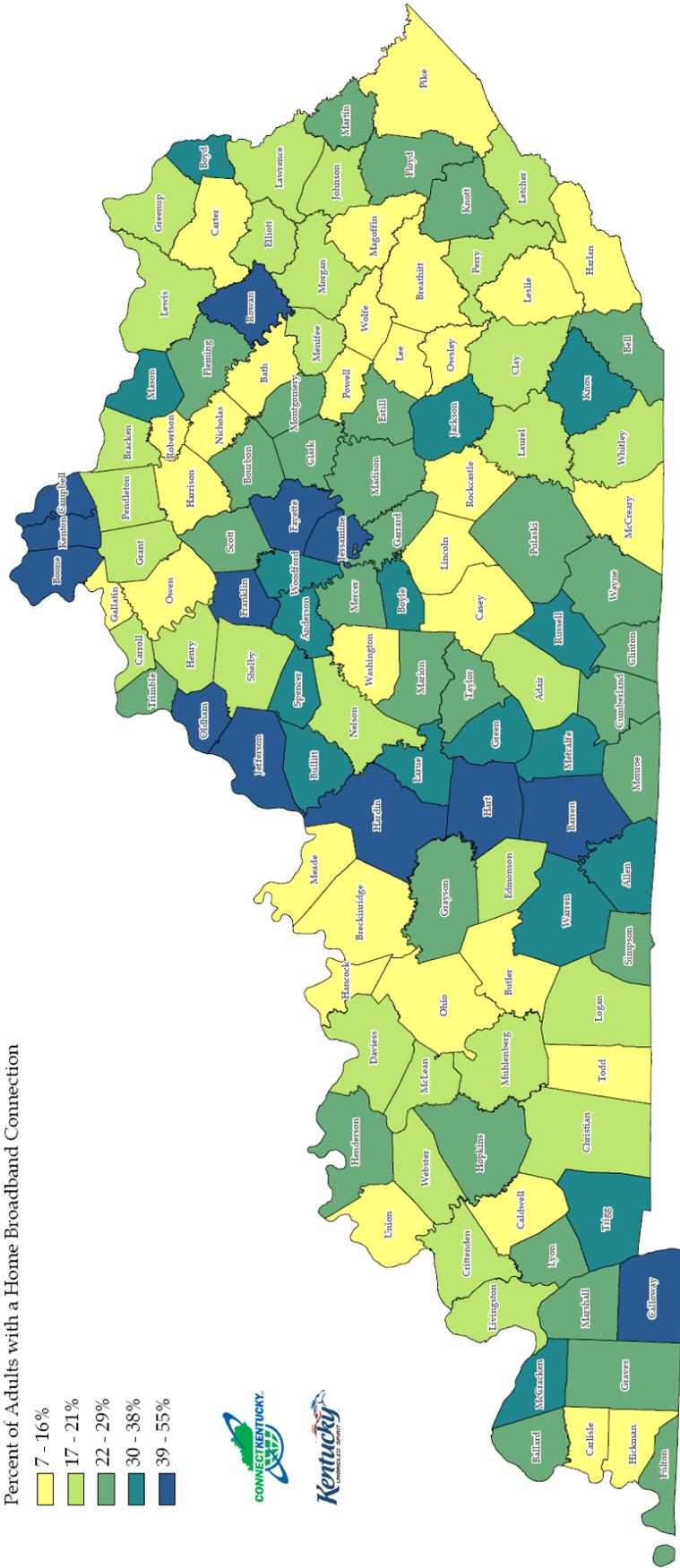
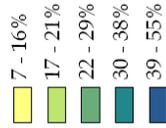
Area less than 0.25 square mile
 Broadband Available*

*Satellite broadband service is not included in Broadband Available. All Rights Reserved.
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Broadband Adoption in Kentucky

Percent of Adults with a Home Broadband Connection

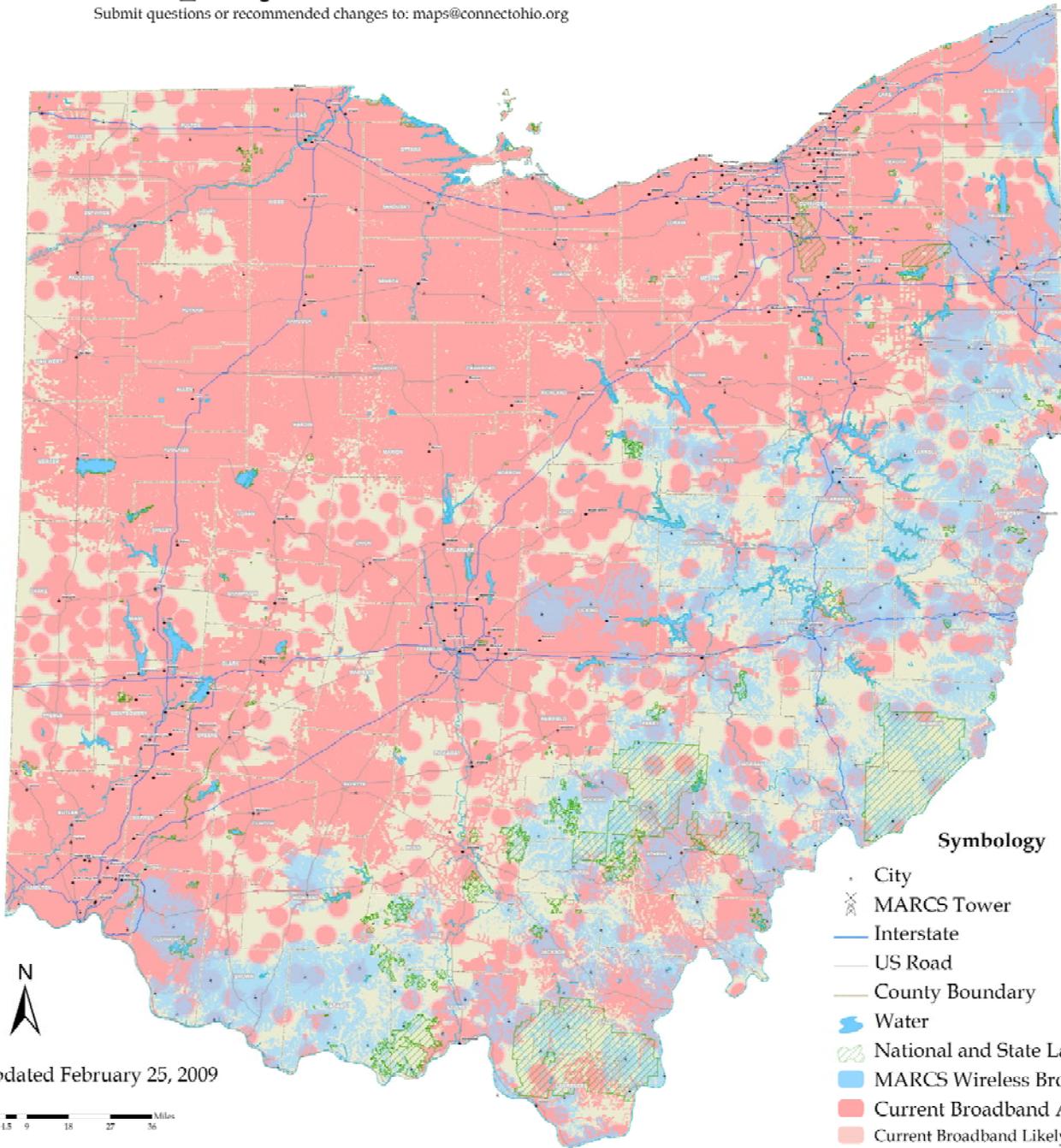


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Theoretical MARCS Tower Display at 900 MHz



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Updated February 25, 2009

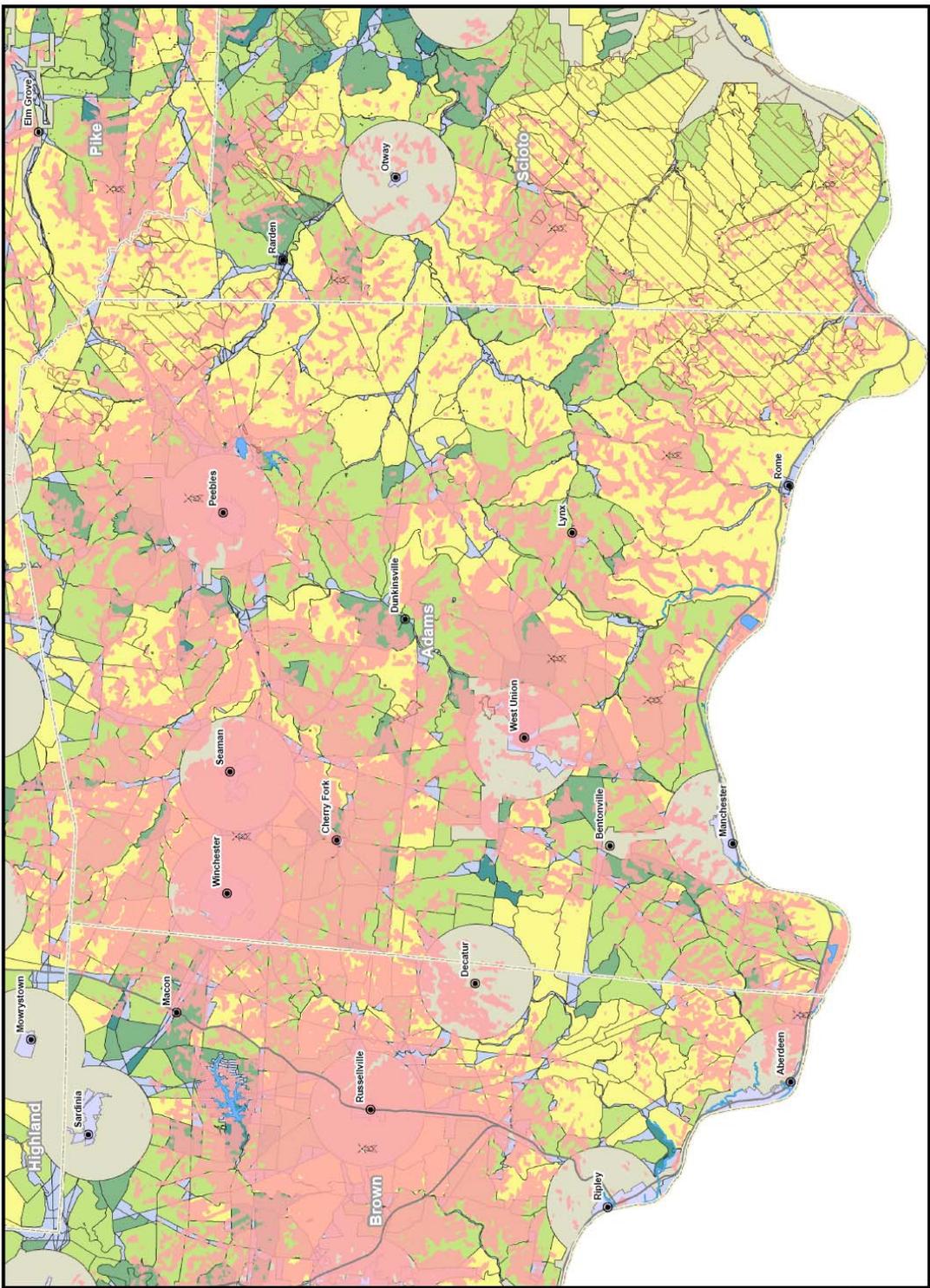


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Theoretical MARCS Tower Display at 900 MHz
 Adams County Ohio

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0 1 2 3 Miles

Symbology

- City
- MARCS Tower
- Interstate
- US Road
- County Boundary
- Water
- National Lands
- Municipal Boundary
- Wireless Broadband Available

Number of Unserved Households per Square Mile, per Census Block

- 0 - 8
- 9 - 20
- 21 - 40
- 41 - 85
- 86+

Area less than 0.25 square mile
 Broadband Available*

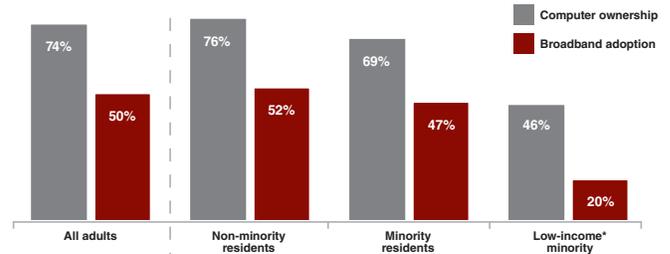
*Available broadband services is not included in broadband availability. All rights reserved.
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The Call to Connect Minority Americans: A Connected Nation Policy Brief

Recent studies show that American minorities continue to be among the nation's digitally disconnected. In surveys conducted across three states, computer ownership and broadband adoption among minority residents lag behind non-minorities.

- Only 69% of minorities own computers, compared to 76% of non-minorities. Among low-income minorities, computer ownership falls significantly lower at 46%.
- Only 47% of minorities subscribe to broadband at home, compared to 52% of non-minority residents. Home broadband adoption among low-income minorities falls to a staggering 20%.

Technology Adoption Among Minorities

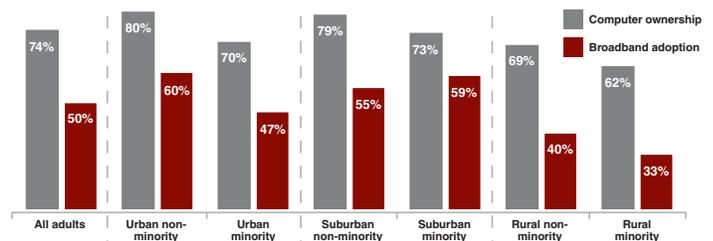


Q: Does your household have a computer? And
Q: Which of the following describe the type of Internet service you have at home?
n=3,005 TN, KY, and OH residents
*Annual household income less than \$25,000
Source: 2007-2008 Residential Technology Assessments of Tennessee, Kentucky, and Ohio

The technology gap for minorities is evident in both urban and rural areas. It is only in suburban areas that minorities maintain computer ownership and broadband adoption rates that are equal or better than average.

- In urban areas, where broadband is nearly ubiquitous, broadband adoption among minorities remains low at only 47%. By contrast, 60% of non-minorities subscribe to broadband in urban areas.
- In rural areas, broadband adoption among minorities still falls well below non-minorities. Only 33% of minorities subscribe to broadband compared to 40% of non-minorities.

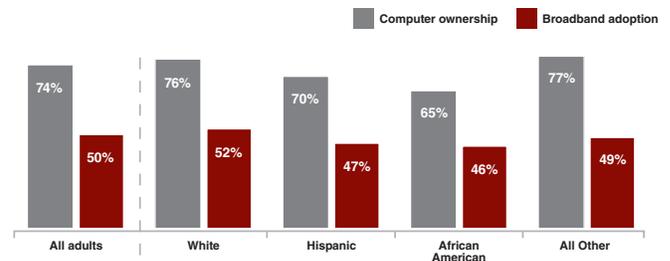
Technology Adoption Among Minorities in Urban and Rural Areas



Q: Does your household have a computer? And
Q: Which of the following describe the type of Internet service you have at home?
n=3,005 TN, KY, and OH residents
Source: 2007-2008 Residential Technology Assessments of Tennessee, Kentucky, and Ohio

The racial breakdown illustrates lower broadband adoption rates among all minorities, with Hispanics and African Americans posting significantly lower computer ownership rates.

Technology Adoption by Race



Q: Does your household have a computer? And
Q: Which of the following describe the type of Internet service you have at home?
n=3,005 TN, KY, and OH residents
Source: 2007-2008 Residential Technology Assessments of Tennessee, Kentucky, and Ohio

Statewide Public-Private Partnerships for Digital Inclusion

Among the broadband stimulus funds in the American Recovery and Reinvestment Act of 2009, Congress and the Obama administration have empowered states and communities to address the digital divide through funding the Broadband Data Improvement Act of 2008. This funding is available to states to develop and implement public-private partnerships for grassroots-driven expansion of broadband and computer use, particularly among low-adoption and underserved populations.

The Broadband Data Improvement Act (as funded in the stimulus act) provides states with a prime opportunity to address the connectivity challenges among minorities. The BDIA grant program provides funds to:

1. Develop street-level broadband availability maps,
2. Conduct detailed market research on the barriers to broadband adoption among various demographics,
3. Establish local technology planning teams in every county for increased broadband use,
4. Facilitate collaboration among the public and private sectors, and
5. Establish computer and Internet connectivity programs, particularly among low adopters and disenfranchised groups.

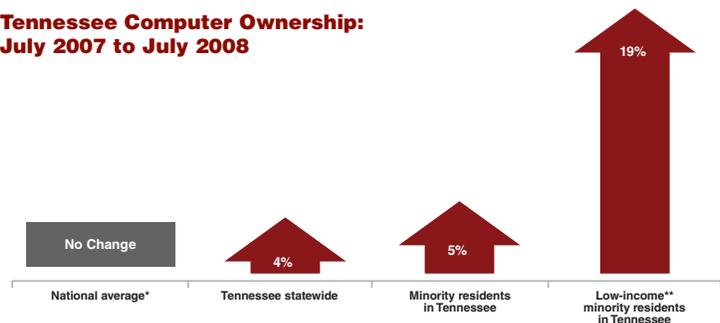
In order to be eligible for funding, states should designate an eligible entity to apply for the grant and operate the statewide program in each community across the state. This eligible entity may be a non-profit organization such as Connected Nation.

In states such as Kentucky, Ohio, and Tennessee, public-private partnerships are connecting the disconnected. Minorities are among those seeing the greatest impact.

After just one year of the Connected Tennessee program, statewide computer ownership increased by 4% compared to stagnant national growth. The increase in computer ownership among minorities was even higher at 5% (again, compared to 0% growth in the rest of the nation). Among low-income minorities, computer ownership increased by 19% in just one year.

Meanwhile, home broadband adoption in Tennessee has realized significant growth, particularly among minorities. Within the one year period, Tennessee's statewide broadband adoption grew two percentage points faster than the nation as a whole, with 18% broadband growth among minorities, and 90% broadband growth among low-income minorities.

Tennessee Computer Ownership: July 2007 to July 2008



Q: Does your household have a computer?

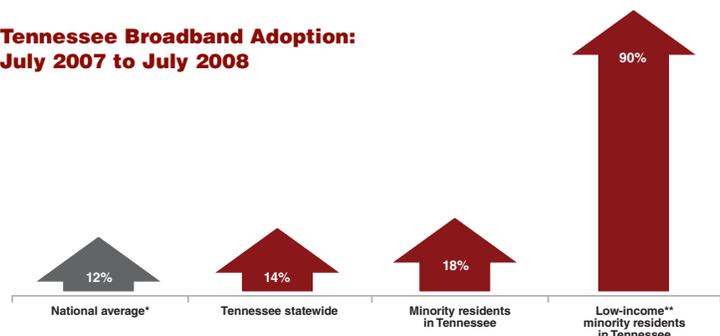
n=1,200 Tennessee residents

*National growth estimated using figures from the Pew Internet and American Life Project

**Annual household income less than \$25,000

Source: 2007-2008 Residential Technology Assessments of Tennessee, Kentucky, and Ohio

Tennessee Broadband Adoption: July 2007 to July 2008



Q: Does your household have a computer?

n=1,200 Tennessee residents

*National growth estimated using figures from the Pew Internet and American Life Project

**Annual household income less than \$25,000

Source: 2007-2008 Residential Technology Assessments of Tennessee, Kentucky, and Ohio