

Before the

**Rural Utilities Service (RUS), Department of Agriculture, and National  
Telecommunications and Information Administration (NTIA),  
Department of Commerce**

Washington, DC

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Request for Information (RFI) seeking public )  
comment on certain issues relating to the )  
implementation of the Broadband Initiatives )  
Program (BIP) and the Broadband Technology )  
Opportunities Program (BTOP).

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**COMMENTS OF THE CITY OF WILLIAMSTOWN, KENTUCKY**

These Comments are respectfully filed by the City of Williamstown, Kentucky (hereinafter referred to as “Williamstown”). Williamstown believes the current definition of “remote area” is too restrictive. Section III of the Notice of Funds Availability (“NOFA”) defines the term “remote area” as “an unserved, rural area 50 miles from the limits of a non-rural area.”<sup>1</sup> The NOFA defines a “rural area” to be “any area, as confirmed by the latest decennial census of the Bureau of the Census, which is not located within: (i) a city, town, or incorporated area that has a population of greater than 20,000 inhabitants; or (ii) an urbanized area contiguous and adjacent to a city or town that has a population of greater than 50,000 inhabitants.”<sup>2</sup>

As further set out below, there are many communities that are truly remote but are regretfully being excluded from the current definition. One such community is Corinth, Kentucky.

**Corinth Should Be Considered Remote**

Williamstown seeks to obtain funding through the Broadband Initiatives Program (BIP) and the Broadband Technology Opportunities Program (BTOP) in order to provide much needed broadband services to the City of Corinth, KY and the Other Areas of Grant County, KY and Owen County, KY, which make up the proposed funded service area. The term “Corinth” as used in these comments means the City of Corinth, KY and the Other Areas of Grant County, KY and Owen County, KY.

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<sup>1</sup> 574 Fed. Reg. at 33109.

<sup>2</sup> Id.

Corinth is an economically challenged, extremely rural area of 484 households, in a remote region of Central Kentucky. Broadband Transmission Service does not currently exist in Corinth. Corinth is in dire need of broadband deployment! However, because Corinth is 39 miles from Florence, KY,(a city with greater than 20,000 inhabitants) Corinth is not classified as a “remote area” under the NOFA.

There are three (3) community anchor institutions, public safety entities, and critical community organizations passed involved with the project. The three institutions include: 1) The Corinth City Hall; 2) The Corinth Water District; and 3) The Corinth Volunteer Fire Department. None of these facilities currently have broadband service. As part of the proposed project, Williamstown will provide free broadband services to all of the entities listed above. Please note that because of the rural nature of Corinth, there are no schools, libraries, colleges, hospitals, or police departments in Corinth.

Currently, public safety officials in Corinth have no access to high-speed broadband services. The proposed project will connect the Corinth City Hall (which houses the Corinth City Government and the Corinth Water District) and the Corinth Volunteer Fire Station, thus making it possible for local public safety officials to communicate quickly in time of emergencies and conduct their day-to-day business in a much more efficient and cost-effective manner.

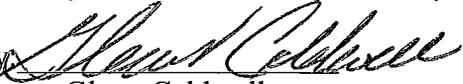
Although Corinth is located near an exit from Interstate 75, the area remains severely underdeveloped due to its lack of available broadband and high speed data services. For example, Corinth has recently annexed 1800 acres into its city limits. The Mayor of Corinth, Mayor William Hill, reports that there is a proposed development for the 1800 acres annexed which includes a major retail center, research and development park, as well as housing and recreational features. An equestrian area is also a possibility in this development as well as lakes for the recreation areas. This land development is planned over a three to five year build out from the start date, however a start date cannot be set until all utilities requirements can be met. Broadband availability is one of these requirements. This land development, as well as the overall growth and development of Corinth, rest on the availability of broadband to Corinth.

### **Conclusion**

Williamstown therefore respectfully requests that Section III of the NOFA be amended to define the term “remote area” as “an unserved, rural area 30 miles from the limits of a non-rural area.” Williamstown believes that the current definition of “remote area” is overly restrictive, thereby eliminating too many areas that were not 50 miles or more from a non-rural area but were nonetheless a fair distance away and unserved. Williamstown believes that the distance requirement should be 30 miles from a non-rural area. This amendment would allow communities such as Corinth to be considered “remote areas.” Additionally, population densities could be considered in making the determination of remoteness.

Respectfully submitted,

The City of Williamstown, Kentucky

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