

From: [Briana Warner](#)
To: [BOCrfc2015](#)
Cc: [Lachman, Adam \(King\)](#); [Stephenie MacLagan](#)
Subject: Broadband Opportunity Council - Island Institute (Maine)
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386 Main Street
Post Office Box 648
Rockland, Maine 04841-0648
Tel: 207-594-9209 • Fax: 207-594-9314
inquiry@islandinstitute.org
www.islandinstitute.org

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To: Broadband Opportunity Council
Re: Island Institute (Maine) - Response to Council's Request for Comment

Dear Council Members:

This letter serves as a response from the Island Institute to your request for comments.

The Island Institute is nonprofit organization that works to sustain Maine's island and remote coastal communities, and exchanges ideas and experiences to further the sustainability of communities here and elsewhere. Vital to Maine's island communities is their ability to attract and maintain year-round island residents while providing economically sustainable careers for their communities.

Maine's year-round island and remote coastal communities are integral to Maine's identity and a crucial part of Maine's history, heritage and culture. They are also home to some of Maine's most important industries. Yet they are struggling to survive as their populations continue to age and young people move away from the islands in search of better jobs. Most of Maine's islands have incredibly slow broadband connections (well under 10mbps) This is a huge disadvantage in today's economy, and it prohibits island businesses from reaching customer bases, inhibits residents from taking telework opportunities, and makes it harder both for new young families to move to the islands and for young islanders to remain in their communities.

How can the federal government promote best practices in broadband deployment and adoption? What resources are most useful to communities? What actions would be most helpful to communities seeking to improve broadband availability and use?

Private telecom companies should be incentivized to invest in small, rural communities. It is these communities that encapsulate America's cultural life-blood and face the most extreme consequences from a growing digital divide. Private companies have, thus far, not felt that investing in these small island communities is profitable. Despite promises that they would improve the broadband infrastructure of the islands, eleven of the fourteen unbridged island communities are still considered "underserved," by the State of Maine's ConnectME Authority.

In addition to incentivizing telecom companies, small town governments should have access to information about, and examples of, innovative solutions that have worked elsewhere – a constantly updated and streamlined federal or state website with this central information would be valuable. In the absence of a telecom company putting investing in small communities, it is imperative that these

communities have access to funding to commission feasibility and design studies focused on community solutions as well as available funds to help them build broadband infrastructure systems.

Currently, there are few federal or state grant programs that fund feasibility or infrastructure design studies for communities. As a result, towns don't have basic information about what their options are for improving broadband at a municipal level. We are sponsoring a feasibility and design study for 13 island communities to give them this important information in order to better inform their decisions about improving broadband infrastructure. This study is costly, and the burden on us as an organization would be significantly diminished with better access to state and federal funds for this purpose.

There should also be federal funds available for digital literacy education programs – particularly for rural businesses. Non-profits, towns, and other groups could use these funds to teach people about how to develop their online marketplaces (especially important for rural businesses), access international markets, find telework opportunities, and learn the basics of digital business accounting. We are just starting to offer such classes without federal or state funds, and the programs have shown incredible results. We can't do as much as we would like given the lack of available grant funding.

How can the federal government best promote the coordination and use of federally-funded broadband assets?

The allocation of federal funds available for broadband feasibility and design studies, as well as broadband infrastructure development projects, should be focused on the states – and areas within these states – that are relatively unconnected. State broadband authorities, like ConnectME in Maine, have been effective in allocating the small pot of funds currently available to them. Federal funding channeled through these state mechanisms would allow for appropriate distribution of funds throughout the state.

What inconsistencies exist in federal interpretation and application of procedures, requirements, and policies by Executive Branch agencies related to broadband deployment and/or adoption, and how could these be reconciled?

The 2014 Farm Bill's definition of broadband adopted by USDA of 4mpbs download and 1mpbs download is insufficient to successfully run a business website. The FCC definition of 25/3mpbs is increasingly insufficient for long-term needs of businesses. The State of Maine defines 10/10mpbs as sufficiently "served." Its important that federal standards are defined in a way that promotes fast growth in connectivity and puts the U.S. (and all of its towns and states) on par or above standards throughout the rest of the global marketplace.

Expanding reliable broadband infrastructure for the rural coastal and island communities of Maine is imperative to keeping these communities viable into the future.

Sincerely,

Briana Warner
Economic Development Director

Island Institute

| **Briana Warner** | Economic Development Director | Island Institute | 386 Main Street | P.O. Box 648 | Rockland, ME 04841 | 207.701.1576 | bwarn@islandinstitute.org | www.islandinstitute.org