



Mr. David J Redl, Assitant Secretary  
National Telecommunications and Information Administration  
1401 Constitution Avenue, NW  
Washington, DC 20230

RE: NTIA Docket No. 180427421-8421-01

Dear Assistant Secretary Redl:

Mid-Columbia Economic Development District supports National Telecommunications and Information Administration and the Federal Communications Commission's efforts to improve mapping of broadband access. Accurately identifying areas that continue to be un- or under-served is key to addressing this challenge as well as supporting both community and economic development.

Mid-Columbia Economic Development District (MCEDD) is made up of three counties in Oregon (Hood River, Wasco and Sherman) and two counties in Washington (Skamania and Klickitat), all bordering the Columbia River. MCEDD was established in 1969 by its five member counties who realized that sharing a regional approach to economic development would maximize the benefit for their shared workforce and economy. Our mission is to "promote the creation of family-wage jobs, the diversification of the economic base, and the growth, development, and retention of business and industry within the district."

A key link to markets, customers, and services for our region's businesses is robust, affordable broadband access. Broadband is vital infrastructure for rural areas that have high proportions of small, home based businesses, agricultural enterprises, and businesses that rely on connections to broader markets for their success. However, due to our rural nature, and incredibly challenging and diverse terrain, building the broadband infrastructure to serve our region is incredibly costly for a limited customer base. The Mid-Columbia has come together for many years, from the Gorge Teleconsortium in the early 2000s to the our most recent broadband strategic planning and coordination efforts conducted to support and partner with internet service providers and other local governments to bring access to our most un-and under-served areas.

A significant challenge for our rural area in accessing available funding for improving broadband access continues to be the accuracy of broadband mapping. We have completed resident, business, and anchor institution surveys within the region's rural areas whose results provide a vastly different picture than the one provided by the maps available.

With a small population, local census blocks can cover a large area with significant variance in service availability despite being marked as served by a provider due to serving a portion of the block. These discrepancies between the maps and actual service provided create a significant barrier for local communities and service providers to accessing public funding focused on addressing gaps in broadband service.

We encourage NTIA to fully explore opportunities to improve mapping of this critical infrastructure. Potential strategies could include:

- Increases in the granularity of the data collected currently.
- Validation of the data provided by ISPs. This could leverage state, regional, and local planning processes where appropriate.
- Exploring utilization of other data sets available through Local, State, and Federal agencies.
- Creation of a straightforward challenge process that would provide opportunities for local communities to make available additional information on access in their area.

Additionally, we encourage NTIA to make the information coming out of this process accessible for small communities in their efforts to improve broadband access. Creating data sets that are readily downloadable with limited bandwidth, trainings on how to utilize the data, and opportunities to provide additional feedback will be key to addressing this critical issue in rural communities. With accurate information, communities can have informed conversations with internet service providers about their needs, target action to address gaps in service to areas with the most need, and work collaboratively to improve broadband service.

Thank you for your continued commitment to increasing broadband access across rural areas through improving the accuracy of information on un- and underserved areas.

Sincerely,



Amanda Hoey  
Executive Director  
Mid-Columbia Economic Development District