To the Co-Chairs of the Broadband Opportunity Council:

Please accept the attached comments for Expanding Broadband Deployment and Adoption by Addressing Regulatory Barriers and Encouraging Investment and Training.

Thank you for the opportunity to express our thoughts.

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June 10, 2015

Mr. Larry Strickling, Administrator  
National Telecommunications and Information Administration

Ms. Lisa Mensah, Under Secretary for Rural Development  
United States Department of Agriculture

Comments from Stevens County Washington and WSU Stevens County Extension

To the Co-Chairs of the Broadband Opportunity Council:

We write these comments representing Stevens County, Washington – a geographically large and mountainous county (2,477 sq. miles) with a rural population (17.6 per square mile) and economically stressed communities (16.5% living below the poverty level.) Because of these challenges, we have areas of our county that have limited access to broadband – the greatest point of access to strengthening the economy in a rural area and providing access to basic government services.

Stevens county government and WSU Extension has collaboratively worked to address these issues of access, awareness and adoption since 1999 with the establishment of the Rural Information Technology Center and ARRA-funded Local Technology Planning Teams through the Washington State Broadband Office. While we were working on this locally-led project, we were coordinating with the NoaNet fiber deployment across the north end of our county. This is a typical comment from a local constituent during our broadband work, “Sure, the internet is used a lot for cat videos, snapshots of brunch, Tweets from celebrities. It is also used for distance learning, telemedicine, telecommuting, videoconferencing, accessing OS/application updates, and myriad other practical applications. Many small businesses depend on it; many more would exist throughout northeastern Washington if it was readily available and affordable.”

This region has historically been a natural-resource based economy and needs to be ready and prepared to adapt to the digital information global economy.

Following are direct comments to the questions posed, with some examples of our engagement and desired action items:

1. **Leverage and Expand Broadband Infrastructure Deployment**

*Q2 How can the federal government promote the coordination and use of federally-funded broadband assets?*

*Q11 Should the federal government promote the implementation of federally-funded broadband projects to coincide with other federally-funded infrastructure projects?*

*Q20 What can the federal government do to make it easier for state, local and tribal governments or organizations to access funding for broadband?*
While the NoaNet build out is very valuable to our redundancy and future opportunities, there is local frustration that when realizing that broadband infrastructure runs through their communities yet they cannot have access to it, the fiber “goes across my driveway but I cannot get to it.” In other words, lack of middle-mile and last-mile connectivity still exists in our county. This is a major issue since lack of broadband infrastructure is proven to undermine economic development competitiveness.

There uncertainty and ignorance about available federal government related to broadband resources. For an organization or a community to build and use broadband, it often requires numerous funding resources through multiple organizations. For example, separate funding may be available and needed for each phase of a project (planning, middle mile, last mile, equipment, training, and ongoing monthly service fees). This creates confusion and results in disjointed responses from communities, especially those small, rural places with the greatest need and the least capacity to complete complex federal grant and loan applications.

**Action items:**

1. Develop and enact policies that encourage partnerships that share existing network infrastructure and resources, such as underutilized network capacity or tower access. Encourage public and private entities alike to share unused resources and network capacity with service providers at a fair and equitable arrangement.
2. Require FirstNet to design and build their nationwide network to fill gaps in infrastructure for unserved or underserved rural areas and allow use of excess capacity for public organizations and private-sector businesses
3. Provide access to federally-funded mapping data (actual speed vs. advertised speed, infrastructure and demand) from earlier ARRA efforts.
4. Update the Community Connects Grant in three ways - provide additional funding, provide stricter oversight for grant recipients and change the eligibility requirements to include underserved areas.
5. Provide guidance and training for county and municipal governments to explore, and where appropriate, fund and deploy their own broadband infrastructure.
6. Provide technical training and more time for rural communities to apply for these complex grants.
7. Provide technical assistance through regional partners at locations where stakeholders from unserved and underserved areas can easily participate. Do not rely on webinars which require significant bandwidth to announce funding opportunities and provide technical assistance.
8. Develop innovative mechanisms that leverage middle mile infrastructure. Mechanisms that involve state/local governments and/or smaller Internet providers as well as larger Internet service providers must be developed to fully leverage this infrastructure that may remain idle otherwise.

2. **Invest in Broadband Adoption and Use Programs**

*Q1 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?*

*Q5 How can the federal government best collaborate with stakeholders (state, local, and tribal governments, philanthropic entities, industry, trade associations, consumer organizations, etc.) to promote broadband adoption and deployment?*

Cooperating agencies: Washington State University, U.S. Department of Agriculture, and Stevens County. Extension programs and employees are available to all without discrimination. Evidence of noncompliance may be reported through your local Extension office.
Q21 How can the federal government support state, local, and tribal efforts to promote and/or invest in broadband networks and promote broadband adoption? For example, what type of capacity-building or technical assistance is needed?

Q23 How can the federal government make broadband technologies more available and relevant for vulnerable populations?

Additional funds for awareness and educational efforts will allow the continuation of extension programs that provide train-the-trainer as well as direct technical assistance to audiences including residents, entrepreneurs, small business owners, and local governments. This will also allow the continuation of successful partnerships between extension services and public libraries, and other anchor institutions for increasing broadband availability and use. Examples of our replicable broadband adoption activities developed through WSU Stevens County Extension include the Tech Expo, (providing an opportunity for providers to showcase their services) a Gadget Garage (providing hands-on opportunities to test drive the latest technology), and Washington Rural Pathways to Prosperity, a statewide economic development conference that simultaneously distributed keynote presentations to 18 sites across the state.

Actions:

1. Create a comprehensive, updatable list or database of broadband adoption funding sources to support increased broadband awareness and use.
2. Develop requirements for interagency communications and coordination of resources to support broadband adoption.
3. Develop resources – flowcharts or other tools – to help communities or organizations follow the steps necessary to create a business case and secure funds to build, equip, and use broadband.
4. Increase broadband awareness and education program funding to provide training and assistance to ensure usage of previous and future broadband infrastructure investments. Including funding for anchor institutions to provide public assess locations, equipment, and technical assistance to increase broadband awareness, education, and use.
5. Provide funding to develop trained and motivated peer mentors to act as business coaches to quickly match best applications to specific individual and business needs. This coaching model would increase adoption for vulnerable populations.

On behalf of WSU Stevens County Government and WSU Stevens County Extension we appreciate the opportunity to submit comments about broadband needs and opportunities in our rural county.

Respectfully submitted,

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