

Minneapolis
City of Lakes

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Office of the Mayor

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September 24, 2009

To: Honorable Larry Strickling
NTIA Administrator
1401 Constitution Avenue NW
Washington, DC 20230

RE: Request to Modify Broadband Stimulus (ARRA) Criteria

President Barack Obama and the Congress in crafting the American Recovery and Recovery Act (ARRA) set out a bold vision for transforming America by encouraging the innovative deployment of broadband networks throughout the nation to meet the needs of those who are currently unserved or underserved. The National Telecommunications Infrastructure Administration's (NTIA) criteria for round one of ARRA Broadband funding, absent some definitional changes, will not completely meet that vision. The rules for round one effectively exclude projects which bring affordable services to the underserved of urban America.

We congratulate the NTIA for the speed and the openness of the process it employed to create the BTOP program, including the "public interest test" of requiring network non-discrimination and interconnections standards for all infrastructure recipients. We are also pleased with NTIA's efforts to promote applications from partnerships which include local governments. The nation's cities and counties have significant expertise and many assets to leverage in bringing broadband networks to our cities and improving adoption among our residents.

Still, in order to ensure that the urban underserved are not excluded from the benefits of the ARRA, we urge the NTIA to change its criteria for the next rounds of funding opportunities in the following ways:

- Eliminate the need to demonstrate 40% or less broadband adoption rate by census block. This requirement is, really, irrelevant to the broader goals of the ARRA and the BTOP: to create jobs and increase the adoption of broadband in the United States.
- Create a definition of “underserved” that captures the economically challenged. An unaffordable broadband service is unavailable regardless of what a broadband service map may claim. NTIA can accomplish this goal by including a requirement that applications must demonstrate the proposed project will reach economically needy individuals such as those living in areas where a significant portion of the population lives in poverty, has high of unemployment rates, or has low of high school graduation rates.

Underserved and unserved individuals, as well as the anchor institutions that serve their needs, must be the target of these programs, not underserved census blocks.

- An exception to the economically challenged requirement should be available to public safety broadband projects. While most, if not all, public safety projects will bring benefits to the urban underserved, the fact that public safety was called out as a goal of the BTOP warrants this exception.

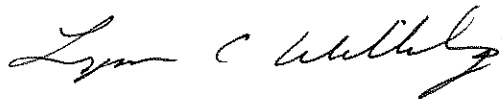
We would be pleased to provide additional information and background on this request to modify and improve the criteria for BTOP grants.

Thank you for considering this request.

Sincerely,



R. T. Rybak, Mayor



Lynn C. Willenbring, CIO

Cc: Honorable Gary Locke
Secretary of Commerce