



NATIONAL GRANGE OF THE ORDER OF PATRONS OF HUSBANDRY

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American Values. Hometown Roots.

Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Michael O’Rielly
Commissioner Ajit Pai
Commissioner Jessica Rosenworcel

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Examining the Value of Free Data Programs and Mobile Connectivity to Rural America

Dear Chairman Wheeler and Commissioners:

On behalf of the National Grange, I write to you today to voice support for free data, or zero-rated programs, from mobile providers as they will help expand access to mobile broadband for rural Americans who are on the wrong side of the digital divide. We encourage the Commission to support the evolution of these programs and to continue its current policy of evaluating them on an as-needed basis, on their own merits, as opposed to any sort of preemptive or categorical ban, as some have suggested.

Our organization has long advocated for increased Internet access in rural America as geographic gaps between those who can get online and those who cannot remain. Today, less than 20 percent of Americans do not have access to high-speed broadband, but in rural America the number is far more staggering – at 53 percent – as geographical isolation impedes access. While there is clearly still work to do, mobile technologies are bridging the connectivity gap. Mobile connectivity has and will continue to be paramount to overcoming this digital divide as it represents an equalizing force that enables consumers – regardless of their geographic location or socioeconomic status – to access the same tools and information and participate in a larger and more diverse economy.

Consider the following examples, which point to how mobile products and services are transforming the agriculture industry, increasing access to educational opportunities, and improving healthcare outcomes for rural Americans:

- Agriculture: Farmers today are far more tech-savvy than the generations that preceded them. Many are leveraging high-tech tools that enable them to increase output, efficiency, and environmental protection. These tools, which include robotic equipment and satellite-navigation networks, are increasingly developed and marketed by farmers themselves. As a result, the entire paradigm of agriculture is shifting, and it's plowing a new path for American agricultural growth that fuels the economy, protects the environment, and meets the demands of the most diverse group of consumers in the history of the planet.
- Healthcare: Rural America is home to about 25 percent of the population, yet only 10 percent of physicians practice there. In addition, rural Americans are more likely to be older, poorer, and not carry health insurance. There is a clear need for greater access to quality healthcare, and mobile solutions are making a difference. Between apps that are used to track chronic conditions and telehealth programs that connect patients to specialists who are hundreds of miles away, rural Americans are getting better and timelier care.
- Education: Technology has a more prevalent presence in education than ever before. Public schools in the U.S. spend over \$3 billion annually on digital content and provide laptops to at least one in five students. As more educational content and training is made available to anyone with an Internet connection, and more learning is done using Internet-based tools and mobile devices, access to technology ensures that any student – regardless of his or her zip code – can access the information and tools necessary for a modern 21st century education.

As rural Americans increasingly turn to their smartphones, tablets, and other mobile devices as their primary means of Internet access, their needs for and consumption of mobile are rapidly surging. This trend is evident everywhere. According to Cisco, mobile data traffic in the U.S. alone grew 56 percent last year and is expected to grow six-fold between 2015 and 2020.

Given the clear growing demand for mobile connectivity in rural America and elsewhere, the emergence of new product offerings like free data programs could not be timelier.

The overarching premise of free data programs is simple: Consumers can access certain content on their mobile devices that will not count against their monthly data plans – like streaming music or watching a video. In other words, consumers get more data with no added cost. Despite some of the more heated and misleading rhetoric around the issue, free data programs are without a doubt a win-win for consumers. CTIA and Harris Poll recently found in a survey that adults – but especially millennials – are overwhelmingly more likely to try new online services if they are part of a free data offering.

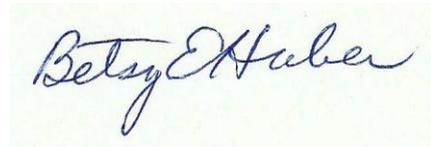
Unfortunately, some advocacy groups that seem to be ignoring the needs of the consumers that we represent do not share our view. Critics of free data claim these programs could allow mobile service providers to choose which companies' web content gets greater visibility, giving the companies who are sponsoring free data an advantage over others online. However, we believe that more data is a good thing. Consumers should be allowed to choose if they want to access content via a free data program and thereby have more of their data leftover to use elsewhere – whether exploring new content or enjoying their existing favorites.

Most importantly, consumers are in no way deterred from continuing to access the online content of their choice, and content providers are by no means limited to rely solely on free data plans to showcase their value to consumers. Companies take on the cost of launching promotions to entice potential customers all the time—it's how businesses in almost every market tries to differentiate themselves from their competitors. Looking through this lens, it is hard to understand why critics would be concerned with free data programs at all. Never do you hear complaints over commercials that allow for free broadcast TV, 1-800 numbers, free parking, or coupons. Why should free data programs be perceived any differently?

Next year, the Grange will mark the 150th anniversary of our founding. Through those years, Grange members throughout the country have worked within our communities, counties, states and on the national level to connect rural communities. From the telegraph and railroad lines to landline phones and broadband Internet, the Grange believes connectivity at all levels is an integral part of ensuring our rural communities remain engaged with more urban communities and vice versa. That is why we support free data programs. Free data will make it easier for more people to access more of the Internet.

We hope that the Commission will reject calls to ban free data programs. Rather, it should consider their immense consumer value and continue to encourage the evolution of free data offerings as well as all other new ideas that will help connect more rural Americans.

Fraternally,

A handwritten signature in blue ink that reads "Betsy E. Huber". The signature is written in a cursive style and is set against a light green rectangular background.

Betsy E. Huber
Master
The National Grange