



October 11, 2019

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th St. SW Room TW-B204
Washington, DC 20554

Re: Reply to Comments by Buckeye Hills Regional Council Regarding the Rural Digital Opportunity Fund WC Docket Nos. 19-126 and 10-90

Madam Secretary:

In reply to comments submitted by the Buckeye Hills Regional Council on Sept. 19, 2019, please accept this letter as support of the recommendations and how they would help to impact the community and economic development efforts in Noble County, located in Southeast Ohio.

The strategic plan created for Noble County includes broadband services as a high priority. The regional plan coordinated most recently by JobsOhio and our regional partner, The Appalachian Partnership for Economic Growth (APEG) also featured broadband as one of its highest priorities. APEG is a nonprofit organization that represents 25 counties where a total of roughly 1 million people live. A recent strategic exercise in the region with 36 meetings illustrates the importance of broadband to these citizens of Ohio in that the topic came up at every single meet as a top priority, according to Mike Jacoby, APEG's Executive Director.

In the FCC Fact sheet for the Rural Digital Opportunity Fund, the background lead statement says: "Broadband access is critical to economic opportunity, job creation, education, and civic engagement."

Just this week, in my community and economic development work, I wanted to learn about the availability of commercial internet to a potential economic development site. There is no current capacity and the cost to gain capacity is \$122,400. If potential companies are looking at other sites with capacity, I guarantee we will lose every time!

One small business in our county explained the financial impact of getting even basic internet to their location – the up-front investment was ridiculous and it required six year contract! Then, they struggled with having the service be on and off again. As a trucking company, the window for potential work with one customer was 13 minutes – if the internet was out during that time, they lost business every time!

My daughter is a freshman in high school and is also enrolled as a freshman at a local community college through the Ohio College Credit Plus program. Her "book" bag should really be called a computer bag – with a digital device provided by both schools. We live "in town" and are lucky to have basic service provided through our community action program at nearly \$50 a month. I wonder about the other children who live out in the county and do not have coverage?



The Buckeye Hills Regional Council's Appalachian Regional Commission study results ask that you carefully consider subscription milestones due to high poverty rates and higher numbers of senior citizens with a lower benchmark percentage. The 70% suggested subscription assumption partnered with previous reserve pricing would once again limit bidder interest for providers in our Appalachian region and therefore, no progress will be made.

Study results also showed that fixed wireless options do not offer a solution for 100% coverage due to the combination of terrain and foliage cover. The absence of reliable, high-capacity broadband impacts us all. I believe, with the FCC's rule changes for the funding opportunity, we just might see companies in our area apply for funding and then, we may finally see marked progress in this Appalachian portion of Ohio.

Thank you for your consideration of the many technical proposed recommendations for modification in the Buckeye Hills Regional Council's comments regarding making the Rural Digital Opportunity Fund a realistic "opportunity" for our part of Ohio! The very definition of opportunity is "a chance for progress or advancement." Let us work to do just that in rural American communities.

Sincerely,

Gwynn Stewart, MS
Community Development Educator