



NATIONAL GRANGE

OF THE ORDER OF PATRONS OF HUSBANDRY

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August 29, 2017

Chairman Ajit Pai
Commissioner Brendan Carr
Commissioner Mignon Clyburn
Commissioner Michael O'Rielly
Commissioner Jessica Rosenworcel
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Restoring Internet Freedom (WC Docket No. 17-108)

Dear Chairman Pai and Commissioners:

The National Grange is pleased to offer this reply comment in support of the Federal Communications Commission's Notice of Proposed Rulemaking on Restoring Internet Freedom.

For 150 years, we have worked to ensure that all communities directly benefit from the latest advances in communications technologies. Our current focus is access to high-speed internet. This tool is a change-agent that is helping to combat problems in rural America by bringing needed healthcare, education, and business resources directly to homes, schools, and family farms.

In short, access to high-speed internet is helping to advance rural America, but only for those who have it. A quote from University of Texas Professor Sharon Strover in the [*Wall Street Journal*](#) sums it up poignantly: "Having access to broadband is simply keeping up... Not having it means sinking."

Knowing this to be true, we were disappointed to see a recent editorial from the [*Los Angeles Times*](#) that said, "Better broadband connections in rural America, poverty-stricken inner cities and other underserved areas is a most worthy goal. But those connections shouldn't come at the cost of net neutrality."

Prioritizing net neutrality – the concept of a free and open internet, which we support – over expanded access to high-speed internet in underserved areas is a false choice. Both can be achieved, if done correctly. Title II is not the answer. A return to a "light touch" rule that fits into a broader national framework is.

As we explained in our [July 17th filing](#), the 2015 reclassification of high-speed internet service as a utility service under Title II of the 1934 Communications Act is causing significant problems for rural communities. Since the reclassification, the U.S. has seen the first ever decline in broadband investment outside of a recession. In fact, multiple internet service providers that predominately

serve the thousands of communities where our members call home said they were curbing plans to expand deployment as a direct result of costs and legal uncertainty stemming from Title II.

That is a deeply troubling reality. A course correction is needed, and we believe the Commission's proposal is a good start to getting back on track. Returning to the longstanding, successful "light touch" approach to internet regulation will remove barriers that are holding investment back; thereby putting rural America on a better path to a connected future.

This "light touch" approach aims to remove regulatory burdens to speed up investment in high-speed internet and should be applied more broadly in a national framework for the internet. Former FCC Chairman Bill Kennard spoke to the importance of such a framework 18 years ago. To say the value of the internet and how consumers have used it has changed in that time is a gross understatement. Given its trajectory – especially as the Internet of Things, 5G, and "the next big thing" explode – it's all the more critical that there is a consistent framework.

In addition to FCC action, we believe Congress should work towards bipartisan legislation that codifies the core principles of net neutrality into law. Without legislation, some degree of regulatory uncertainty will loom as net neutrality policies could continue to change from one administration to the next.

Finally, in honor of August being Rural Broadband Month at the FCC, we'd like to reiterate our support for the steps the Commission has taken thus far under Chairman Pai's leadership to close the digital divide. We're honored to serve on the Broadband Deployment Advisory Committee and look forward to continuing to work with the Commission to identify ways to modernize rules governing permitting, zoning, franchising, and other areas that can hinder deployment.

Respectfully submitted,

A handwritten signature in black ink that reads "Betsy E. Huber". The signature is written in a cursive, flowing style.

Betsy Huber
President