

November 28, 2017

**Via Electronic Submission**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Room TW-A325  
Washington, DC 20554

Re: Notice of *Ex Parte* Presentation, *Accelerating Broadband Deployment*  
GN Docket No. 17-83 (DBAC)

Dear Ms. Dortch:

I am submitting for the record in the above captioned proceeding reply comments filed by NRECA in the *Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment* (WT Docket No. 17-79) and *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment* (WC Docket No. 17-84) dockets on July 17, 2017. The members of the Broadband Deployment Advisory Committee (BDAC) will find the reply comments very informative as they move forward with their recommendations to the FCC.

The reply comments focus on impediments to broadband deployment in rural communities, especially those served by rural electric cooperatives. Broadband deployment by major service providers in rural communities is primarily a function of population density. Despite this fact, some major service providers attempt to establish a causal relationship between unregulated pole attachment rates and broadband deployment. Examples were provided in which electric cooperatives offered major service providers the federal cable rate or even free pole attachments in exchange for coverage of their entire cooperative service territory. The offers were not accepted, indicating that pole attachment rates are not the impediment to deployment some major providers claim.

A study of three states, comparing the deployment rates of broadband in rural areas served by electric cooperatives to broadband deployment in rural areas served by investor owned electric utilities, found a strong correlation between low household density per square mile and lower broadband penetration in rural parts of the country. The rural areas served by

investor owned electric utilities are subject to FCC pole attachment rates. If the pole attachment rates of electric cooperatives are truly the driver of provider decisions, one would expect the availability of broadband to be significantly higher in the rural areas served by investor owned utilities. That conclusion was not borne out by the study. Deploying broadband to the rural communities served by electric cooperatives is simply more expensive due to the lower population density, and not unregulated pole attachment rates.

One specific impediment to broadband deployment is restrictive state laws that limit market entry for non-governmental entities, such as electric coops. NRECA urges the FCC to discourage such restrictive state laws.

If you have any questions regarding this ex parte notice, please contact the undersigned.

Sincerely,

*/s/ Brian M. O'Hara*

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Cc: