



STATE OF WASHINGTON  
Office of the Governor

September 24, 2014

The Honorable Tom Wheeler  
Chairman  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20536

Re: *Connect America Fund*, WC Docket No. 10-90.

Dear Chairman Wheeler:

I am writing to urge the Federal Communications Commission (Commission) to consider moderate changes to its current rules regarding the Connect America Fund (CAF) in order to maximize its effectiveness in promoting the availability of high quality broadband service in rural areas. Washington shares the Commission's appreciation that increased deployment and adoption of broadband technology and services hold the promise of enhanced economic development and public safety along with improved health care, educational opportunities and a better quality of life for rural residents and businesses.

As Governor of Washington, I strongly believe that continued progress in the deployment and adoption of broadband technology is vital to ensuring that the state retains its advanced competitive position in the global economy and continues to promote an attractive and innovated business environment and sustainable job growth. Accordingly, I support your efforts to move forward with plans for a second round of CAF funding subject to consideration of disbursement rule modifications that I believe would enhance the Commission's objective to deliver on its aspiration to bring high-quality broadband services to rural America.

First, I strongly support the Commission's desire to adapt universal service reforms in order to ensure that those residents living in high-cost rural areas have access to broadband services that are reasonably comparable to services offered in urban areas. As part of this objective, I understand the Commission is proposing to revise its current broadband performance obligations to require minimum speeds of 10 Mbps downstream to ensure that the services delivered by virtue of CAF funding are reasonably comparable to the services enjoyed by consumers in urban areas of the country. As you consider this reasonable increase in expected broadband service performance, I urge you to concomitantly adopt a more reasonable timeframe and support period for recipients of funding to extend or build out network facilities to reach the revised minimum speed objective. Specifically, I believe that the current five year time period for CAF support should be extended up to 10 years to allow carriers to build higher capacity networks and to be consistent with the timeframe being offered to carriers awarded CAF support pursuant to competitive auction.



Second, I support CAF funding rule changes that would provide greater flexibility to eligible carriers to deploy broadband service to high-cost rural locations in unserved or partially-served census blocks that competitors may not serve completely at the Commission's service performance objective of at least 10 Mbps downstream. Although I share the Commission's efforts to provide broadband funding only where it can be demonstrated that an unsubsidized competitor does not exist, I also support some commenting parties' proposals to implement a rigorous validation process to determine where competitive alternatives do or do not actually exist in order to broaden the scope of eligible areas where CAF Phase II monies may be most sensibly utilized. A fairly administered challenge process is vital to ensuring that CAF funds can be used to reach as many un-served, high-cost households including those living in census blocks where some, but not all, households already have access to broadband services at no less than 10 Mbps downstream.

I am aware that you are receiving input from many interested parties on a broad range of issues concerning CAF funding. The issues and potential rule changes under consideration in this proceeding are critical to expanding broadband availability in the more rural and high-cost areas of our nation and I applaud your efforts to improve the overall effectiveness of the program. Accordingly, Washington remains eager to work with you to realize the nation's ambition to ensure that all Americans have access to effective broadband service as a means to participate fully in the digital age.

Very truly yours,



Jay Inslee  
Governor