

**Before the  
Federal Communications Commission  
Washington DC 20554**

**In the Matter of** )  
 )  
**Rural Broadband Strategy** ) **GN Docket No. 09-29**  
 )

**Comments of Cisco Systems, Inc.**

Cisco Systems, Inc. (“Cisco”), a leading producer of technology, equipment, solutions and services used in IP-networks globally, is pleased to offer its comments in response to the Commission’s Public Notice in the above-captioned docket.<sup>1</sup> In its Public Notice, the Commission seeks comment on how it should implement those provisions of the Farm Bill of 2008 with respect to interagency coordination with the Rural Utilities Service (RUS), a part of the Department of Agriculture. In the bill, the Congress asks the FCC to submit a report including recommendations that will promote interagency coordination of:

- Policies, procedures, and targeted resources, and to streamline or otherwise improve and streamline policies, programs and services;
- Federal rural broadband or rural initiatives;
- Short and long-term needs assessments and solutions for a rapid build-out of rural broadband solutions and application of recommendations for policymakers at all levels of government; and
- Specific Federal agency programs and resources, including identification of how such programs and resources can best address rural broadband requirements and overcome current obstacles to deployment.

Congress is correct that the two agencies have much to discuss. The Rural Utilities Service has been engaged for some time in awarding both grants and loans for broadband projects, distance learning projects that involve broadband, and rural

---

<sup>1</sup> Comment Date Established for Report on Rural Broadband Strategy, Public Notice, GN Docket No. 09-29, DA 09-561, released March 10, 2009.

telehealth projects as well. The RUS has a wealth of data about its rural telecommunications borrowers, as well as its broadband borrowers and grantees. The Commission, meanwhile, has data generated from its regulation of rural service providers and administration of the universal service support program, as well as its broadband data collection, and the newest initiative that will be conducted with the National Telecommunications and Information Administration – broadband mapping. There are open issues now under debate about when and to what extent the Commission’s universal service program should be modified to support broadband networks, a move that should be coordinated with RUS’s lending and grants initiatives with respect to rural areas. The Commission’s rural health pilot program, meanwhile, uses universal service money to achieve many of the same objectives as the RUS’s rural telehealth program. On the surface, there appear to be significant opportunities for coordination that could produce a more effective use of federal policy and funding in support of rural broadband. However, generating a positive result will require the agencies to do business in new ways. The remainder of this comment discusses how Cisco has approached new “requirements” for collaboration within our enterprise. We offer these comments as observations of what has worked in our case, in the hope that the Commission could take away from our experience something of value.

For the past two years, Cisco has been engaged in a significant transformation of the way we do business that requires new forms of collaboration across dozens and dozens of business units and functions. In Cisco’s case, this commitment to collaboration has been driven by a need to quickly address technologies and solutions that span

multiple markets, and to ensure that the company was driving innovation toward opportunities that are valued by our customers. In the new Cisco, development decisions are made by cross-functional executive-level boards or councils that are supported by cross-functional teams composed of employees. Groups that never interacted before are now collaborating on projects on a daily basis. These virtual teams of workers and decision-makers have been called upon to conduct their work in new ways. Rather than linear and sequential workstreams, the virtual teams are organizing their work to proceed in compressed time frames and in a multi-dimensional way that will realize efficiency gains. To take full advantage of the new approach to work, Cisco has also made significant adjustments in the technologies we use to enable this new level of collaboration.

Our decision to reinvent Cisco with a new focus on collaboration in decision-making is not intended merely to benefit Cisco and its shareholders, but to organize ourselves to function as a leading-edge enterprise-wide “use case” of work in the 21<sup>st</sup> century. Whether it is building a new car, responding to a Request for Proposal or improving the functioning of a supply chain, our global enterprise and service provider customers are or will be undergoing similar transformations as Web 2.0 technologies permeate the workplace. In Cisco’s view, by embracing a new collaborative work environment, we can better assist our customers in making the transition from the perspective of both technology and business practices.

There are some best practices that are emerging from our experience that we think are directly relevant to the collaboration problem facing the Commission with the Rural Utilities Service. Fundamentally, the coordinated processes that Congress wants the agencies to institute are an exercise in collaboration across agencies. Done right, collaboration between the Commission and the Rural Utilities Service should be able to achieve real benefits to both agencies and to their shared mission of encouraging broadband deployment in rural areas. Collaboration will reveal areas where the two agencies perform the same or similar functions, where information from one can assist the other, and should be the basis of a joint approach to promoting broadband deployment in rural America.

In Cisco's experience, establishing an effective collaboration mechanism begins at the top. Congress has done that by placing a policy mandate on the agencies in the Farm Bill, requiring coordination. But it is how the agencies choose to embrace the requirement that will make a difference in whether such coordination is "make work" or effective.

In the case of the Commission and the Rural Utilities Service, one approach to ensuring the effectiveness of coordination is to form a board or council consisting of the FCC Chairman and Commissioners and the RUS Administrator that would meet quarterly for the purpose of directing staff-level collaboration and for hearing recommendations that staff brings back for consideration. This is a critical step, because the executives at each agency need to signify their support for the collaboration initiative,

and of the delegation to staff within each agency that will perform the day-to-day work.

While it may be all too obvious, it is worth repeating -- executives do not “scale” and cannot perform the coordination work themselves.

It is not important for the board or council to formally vote on staff recommendations that they hear. Indeed, it would be bad practice to do so if RUS were outnumbered by FCC participation. In fact, the most important reason to have all the executives together is to identify by consensus a common set of goals for the collaboration problem. Examples of an initial set of goals could be:

- Efficient sharing and coordination of data and information – for telemedicine programs, broadband-based distance learning programs, and broadband data collection;
- Efficient use of taxpayer money in support of broadband build-out to rural America and identification of geographies with unmet needs;
- Identify and eliminate barriers in the grant/loan application process that prevents or discourages participation in RUS programs; develop recommendations to Congress if the identified barriers are statutory;
- Recommendations to state and local officials for actions that would support broadband deployment in rural areas; and
- Use both agencies to communicate broadband grant and loan opportunities to constituent entities.

With any goal, it is important to think about whether there might be a metric to measure success if the collaboration recommendations are implemented. In addition, it is important to recognize that once a goal is achieved, that it might make sense to replace it with a new goal. Goals can and should evolve over time.

Having set forth a common understanding of goals to be accomplished, the board or council should identify specific workstreams needed to further these goals. What are the categories of work that need to be performed? These are not specific tasks, but

should be thought of as deliverable items for board review. A deliverable might be a recommendation on how to share information on telemedicine programs. As in the case of goals, deliverables will evolve over time. For example, once the agencies implement an information sharing plan, they might want to start a new workstream to evaluate its effectiveness.

Specific workstreams should be performed by designated career staff, led by a single staff member acting as project manager. It is important that the board create a clear definition of the project management roles, timelines, and workproduct expectations. Project managers need to place a premium on open communications, because ambiguity and conflicts will necessarily arise in any new collaboration forum. The project manager should be able to draw on staff from both agencies and in particular those with relevant knowledge. The project managers should also have access to agency experts outside the work team.

As deliverables come back to the board or council for review, the recommendations contained in them might require further action, such as a rulemaking, by the relevant agency. If further action is required, each agency should proceed according to its own procedures.<sup>2</sup>

Finally, the agencies should give some thought to what technology tools might be helpful to the collaboration initiative that might be beyond what the organizations support

---

<sup>2</sup> The board or council should also be a place where the agencies share their decisions not to implement recommendations, or to modify the recommendations. There may be reasons why the Commission or RUS would not want to implement recommendations that were not uncovered in the staff investigation, but that should be considered by the executives.

today. Can the organizations support real time collaborative editing of a document, persistent “chat” on a discussion thread, wikis or collaborative workspaces, and easy creating of email distribution lists? In Cisco’s experience, these capabilities are important to ensuring that the collaboration exercise is efficient and productive.<sup>3</sup> Face to face meetings and laborious exchange of large attachments on email that present version control issues tend to slow down the process considerably. The Commission and RUS should assess whether collaboration tools would also benefit the process here.

For the initial report to Congress, the Commission should focus on recommending a compact set of initial goals, along with a summary of how agencies will approach the work to be done, and any metrics that the agencies can identify to measure their success.

---

<sup>3</sup> More information about business practices and collaboration tools can be found here: <http://www.cisco.com/en/US/netsol/ns870/index.html>

In this Comment, Cisco has suggested by way of example some goals that the agencies could identify, and discussed our experience in collaborative management. To the extent the Commission chooses to draw upon our experience in developing its report to Congress, and in executing on the recommendations it makes, Cisco would be pleased to offer any further assistance on collaborative business practices that the agencies may find helpful.

Respectfully submitted,

CISCO SYSTEMS, INC.

By: Mary L. Brown  
Cisco Systems, Inc.  
1300 Pennsylvania Ave NW  
Suite 250  
Washington DC 20004  
(202) 354-2923  
[marybrow@cisco.com](mailto:marybrow@cisco.com)

March 25, 2009