



**National Rural Electric  
Cooperative Association**

A Touchstone Energy® Cooperative 

March 25, 2009

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW, Suite TW-A325  
Washington, DC 20554

**RE: Rural Broadband Strategy, GN Docket No. 09-29**

Dear Ms. Dortch:

The National Rural Electric Cooperative Association (“NRECA”) appreciates this opportunity to respond to the Federal Communications Commission’s (“Commission” or “FCC”) March 10, 2009 Public Notice of Inquiry (“Inquiry”)<sup>1</sup> regarding the implementation of Congress’s directive in the Food, Conservation, and Energy Act of 2008 (2008 Farm Bill) that the Chairman of the FCC develop, in consultation with the Secretary of the Department of Agriculture (“Department”), a comprehensive rural broadband strategy.<sup>2</sup> NRECA strongly supports the goal of implementing a national rural broadband strategy to ensure that all citizens have access to advanced telecommunications and information services, especially those located in rural and otherwise hard to serve areas.

NRECA is the not-for-profit, national service organization representing nearly 930 not-for-profit, member-owned rural electric systems, which serve 42 million customers in 47 states. Rural electric cooperatives (“Cooperatives” or “Co-ops”) employ approximately 70,000 people in the U.S., serving 18 million businesses, homes, schools, churches, farms and other establishments in 2,500 of the 3,141 counties in the U.S.

NRECA estimates that Cooperatives own and maintain 2.5 million miles of electric power line, or 42% of the nation’s electric distribution line covering three quarters of the nation’s landmass. However, Co-ops still average fewer than seven customers per mile of electric distribution line and this low population density continues to preclude the rapid deployment of broadband service to rural America. Low population densities coupled with the issue of traversing vast expanses of remote and often rugged topography presents unique financial and technological barriers for the deployment of broadband to rural communities.

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<sup>1</sup> *Comment Date Established for Report on Rural Broadband Strategy*, GN Docket No. 09-29, Public Notice, DA 09-651 (Mar. 10, 2009) (*Inquiry*).

<sup>2</sup> Pub. L. 110-246, 122 Stat. 1651 (June 18, 2008 Farm Bill).

NRECA applauds the Commission's efforts promoting the deployment of broadband in rural communities and recognizes that interagency coordination and cooperation is a prerequisite to successful implementation of the Broadband initiatives contained in both the 2008 Farm Bill and the American Recovery and Reinvestment Act of 2009 ("ARRA")<sup>3</sup>. Indeed, interagency coordination is essential to prevent excessive diversion of resources from other valuable programs administered by the understaffed Rural Utilities Service ("RUS") or the National Telecommunications and Information Administration ("NTIA").

NRECA and the National Rural Telecommunications Cooperative ("NRTC") share not only an overlapping rural membership, but also the desire to improve the economic and educational opportunities that may elude our rural constituents due to the lack of advanced broadband services. Consequently, NRECA generally agrees with NRTC's comments submitted in response to the Commission's Inquiry and offers its support for the proposals aimed at eliminating barriers to broadband deployment and achieving universal broadband for rural America, including the following:

1. NRECA supports NRTC's commitment to bring affordable, shovel-ready WiMAX broadband to several difficult unserved and underserved regions.
2. For the purposes of broadband funding, there should be a presumption that all counties designated as "rural" are "unserved" or "underserved" and thereby eligible for funding under the ARRA.
3. When it comes to broadband, faster data speeds are obviously better. However, hard-line data speed standards should not be established as long as satellite service remains the only feasible choice for difficult to serve areas. Broadband speed is relative, especially in rural areas presently incapable of being served by faster terrestrial technologies. Satellite broadband, with its ubiquitous coverage, is often the only affordable broadband alternative to sluggish dial-up service.
4. Interagency coordination should work to streamline and expedite the funding processes. To the extent applicants can coordinate with states and local governments to determine the needs of the community, they should be encouraged to voluntarily do so. Granting priority to applicants who demonstrate they have coordinated with the states may be one alternative. However, involving the states in the formal application or funding process runs the risk of adding another bureaucratic layer that may needlessly delay the funding of much needed projects. Three federal agencies are already coordinating the process. Formally involving the states may put too many cooks in the kitchen, so to speak.
5. The ARRA is, first and foremost, an economic stimulus act. The creation of a national broadband map is a worthwhile objective and should prove to be of significant value. However, initial funding of deployable broadband projects should not be delayed where reliable local mapping adequately supports the

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<sup>3</sup> American Recovery and Reinvestment Act of 2009, Pub. L. No. 111-5, 123 Stat. 115 (2009) (ARRA).

application. A national broadband map can always be used to support application when it becomes available.

NRECA also agrees with the Consumer Federation of America and Consumers Union (collectively “CFA”) comments filed in this proceeding, that it is critical, in implementing a comprehensive rural broadband strategy, that the Commission and Department establish basic principles to guide the expenditure of funds across all agencies charged with the deployment of broadband in unserved and underserved areas. Further, NRECA agrees with both CFA and NRTC that while technologies such as WiMAX and satellite can provide the last mile of service to rural Americans, this cannot be accomplished without access to the critical “Middle Mile” of fiber.

The Commission’s decisions concerning the implementation of a comprehensive broadband strategy will have a profound and lasting impact upon rural communities and the nation as a whole. Once again, NRECA applauds the Commission’s efforts in this endeavor to deploy sustainable and affordable broadband services to hard to serve rural areas.

Respectfully submitted,

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