



CETF COMMENTS TO THE FCC AND USDA FOR RURAL BROADBAND STRATEGY

GN Docket No. 09-29

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The California Emerging Technology Fund (CETF) providing recommendations on the following portions of the 2008 Farm Bill Section 6112:

- A. To promote interagency coordination of Federal agencies in regards to policies, procedures, and targeted resources, and to streamline or otherwise improve and streamline the policies, programs, and services;
- D. To identify how specific Federal agency programs and resources can best respond to rural broadband requirements and overcome obstacles that currently impede rural broadband deployment.

Re-evaluating the definition of “rural” is fundamental to a successful broadband deployment strategy that benefits the nation from the largest agricultural producer in the world: California.

Interagency Coordination

It is critical that the Federal Communications Commission (FCC), Rural Utilities Services (RUS) and National Telecommunications and Information Administration (NTIA) coordinate policies, procedures, and targeted resources, and to streamline or otherwise improve and streamline the policies, programs, and services to expedite effective distribution broadband funds and ultimately broadband deployment.

It is also important for other agencies in the federal government to report how they are enabling broadband deployment and adoption.

- In rural areas, using federal lands can be very important in terms of reaching the population, either with wireline or wireless. The Department of Interior can look at policies that could be used to facilitate deployment.
- The Housing and Urban Development Department can be encouraged to build “smart housing” with broadband.
- The Department of Labor and the Workforce Investment Act can facilitate and accelerate digital literacy training for all workers.

To the extent that any of the agencies are seeking input from outside funding institutions CETF is poised to cooperate by sharing best practices and lessons learned.



Overcoming Obstacles

Policies must allow each rural community to find broadband solutions that work. This requires:

- Technology solutions for their terrain and population distribution;
- Products and services appropriate for the residents and commercial establishments; and
- Local knowledge of existing infrastructure.

The current definition of rural will work to the detriment of California because it leaves 1.4 million rural Californians unserved. CETF recommends the following three criteria be used to define **rural** so that it reflects the national spirit and intent of increasing rural broadband deployment:

- The community does not have a city larger than 20,000 within five miles.
- An area whose economy is, or was in the last ten years, natural resource based, i.e. farming, mining, tourism or forestry.
- An area that is isolated by limited public transit, government services, educational facilities or is medically underserved.

CETF recommends a unified and consistent definition of unserved and underserved among federal agencies and programs, especially at the FCC, USDA and DOC.

For **unserved** CETF recommends the following criteria:

- An area with no broadband Internet provider or only with broadband Internet service at speeds less than 3 Mbps download and 1 Mbps upload.
- An area with insufficient backhaul and backbone service availability that inhibits 3 Mbps download and 1 Mbps upload, or greater, broadband Internet deployment.

For **underserved** CETF recommends the following criteria:

- An area with only 1 broadband Internet provider offering services at speeds equal to or greater than 3 Mbps download and 1 Mbps upload.
- An area with broadband Internet service that is cost prohibitive for the end user.

Speed should be a functional requirement based on current and anticipated next generation broadband Internet applications. Bandwidth comparisons should be from the user perspective with speeds that can be measured at median peak use and not the theoretical service maximums.

Maintaining competition in a rural environment is critical to future product development and service quality. This can be achieved by requiring rural ISPs to support:

- A competitively priced, commercially-supported wholesale offering.
- Bundled and unbundled (a la carte) wholesale service components.
- Wholesale user service components to include (if relevant) customer premise equipment, zero mile access, last mile access, aggregation, backhaul, transport and transmission and ultimate hand-off.



- Wholesale Quality of Service (QoS), service parameters and Service Level Agreements (SLA) at par with services operated by the underlying physical network operator.

It is critical that all programs be technology neutral. Wireless and wireline solutions each have strengths and weaknesses, and when deployed in a hybrid fashion the end result can be a shorter time to market, cost-effectiveness, scalable and feature rich.

Conclusion

CETF is actively engaged with 75% of the counties in California through Rural Consortia, consisting of nearly all the rural lands and communities within the state. Residents, local leadership, non-profits, corporations and community-based organization all share enthusiasm when an opportunity to better their community arises. Federal agencies will greatly increase broadband penetration, and project success rate, within the rural communities if local stakeholders are active participants in a solution. The CETF is available to assist the FCC in engaging such individuals and organizations in California while completing the Rural Broadband Strategy.

Respectfully submitted,

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