

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

Comments

NBP Public Notice # 10

Broadband Clearinghouse

GN Docket Nos.

09-47

09-51

09-137

**COMMENTS OF THE  
NATIONAL ASSOCIATION OF TELECOMMUNICATIONS  
OFFICERS AND ADVISORS (“NATOA”)**

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November 16, 2009

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NATIONAL ASSOCIATION OF TELECOMMUNICATIONS  
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The National Association of Telecommunications Officers and Advisors (“NATOA”) hereby files these comments in response to NPB Public Notice # 10.

NATOA is the national association that represents the communications needs and interests of local governments, and those who advise local governments. NATOA’s membership includes local government officials and staff members from across the nation whose responsibility is to advise and implement telecommunications policy for the nation’s local governments. These responsibilities range from cable franchising, rights-of-way management and government access programming to information technologies and Institutional Network (I-Net) planning and management.

NATOA, along with other national organizations representing local governments, such as the National League of Cities, the United States Conference of Mayors, and the National Association of Counties have been intimately involved in providing local government’s input as the Federal Communications Commission (“Commission”) develops the National Broadband Plan.

In NBP Public Notice # 10, the Commission seeks comments on the creation of a broadband clearinghouse. NATOA strongly supports the development of a broadband clearinghouse. We believe that a broadband clearinghouse would be an excellent tool for “reduc[ing] information barriers” for municipalities, businesses, non-profit organizations or other entities that are interested in improving their broadband infrastructure, deployment, or adoption plans.

In order for the clearinghouse to be effective, the site must be carefully designed and maintained. NATOA supports the development of a clearinghouse that is a publically available website modeled after the prototype created by the City and County of San Francisco, California<sup>1</sup> (“San Francisco”). The San Francisco site is based on an open source platform that uses interactive tools to “crowdsource”<sup>2</sup> the operation of the site and manage the content.<sup>3</sup> The San Francisco open source model has significant advantages over a traditional Web portal design. Most notably, the open source model allows for increased participation, especially by those entities without extensive resources.

San Francisco is a leader among local governments in the creation and deployment of open source and Web 2.0 social networking applications. San Francisco has received critical acclaim for projects such as DataSF.org. This open source website provides residents with real-time access to City datasets such as geographic information system data, crime statistics, and

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<sup>1</sup> San Francisco’s prototype site is available at <http://apps.sfgov.org/broadbandamerica/>.

<sup>2</sup> Crowdsourcing is a term credited to Jeff Howe of “Wired” magazine. It means that “certain functions, which were the exclusive purview of one individual or a small group can be outsourced to the broader community using the power of social media applications.” By engaging residents local governments are learning that innovative solutions that address community needs can be achieved by harnessing the collective knowledge and ingenuity of our citizens. See Comments of NATOA, NLC, USCM, and NACo, *Contribution of Federal, State, Tribal, and Local Government to Broadband*, GN Docket Nos. 09-47, 09-51, 09-137; see also Wikipedia, <http://en.wikipedia.org/wiki/Crowdsourcing>.

<sup>3</sup> See City and County of San Francisco Comments, *Broadband Clearinghouse*, GN Docket Nos. 09-47, 09-51, 09-137 at 4 (filed Nov. 16, 2009).

City service schedules. Access to this raw data has sparked development of innovative new “mash-ups” or combinations of various datasets with beneficial new uses.

San Francisco has also taken the lead in creating innovative government uses for social networking tools, such as Facebook, Twitter and YouTube. Through San Francisco’s Facebook page, residents and visitors may receive alerts about city services via email or post comments on new city services. Also, residents may tweet San Francisco’s 311 information center with questions or comments and may also use the information center to place requests for City services.<sup>4</sup>

NATOA also believes that the Commission is best positioned to create and maintain oversight over the Broadband Clearinghouse. A uniform clearinghouse that would most practically come from the federal government is necessary to maximize the effectiveness and ensure the sustainability of the clearinghouse.

NATOA agrees with San Francisco that the oversight entity (in our proposal, the Commission) should avoid exerting editorial control over the content of the Clearinghouse.<sup>5</sup> If the Commission were to engage in editorial review, it would risk the appearance of self-interest or bias. This appearance can be avoided by not filtering content and relying on crowdsourcing to manage the content of the clearinghouse.

The experience of San Francisco with the development of its prototype site must be given significant weight as the Commission investigates the creation of a Broadband Clearinghouse. An open source site, created and maintained by the Commission relying on crowdsourcing, rather than direct filtering, to oversee the content would be a great benefit to local governments and the businesses and other organizations in our communities.

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<sup>4</sup> See *id.* at 3.

<sup>5</sup> See *id.* at 10-11.

Respectfully submitted,

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