



coalición
RURAL
coalition

1029 Vermont Ave NW Suite 601
Washington, DC 20005
phone 202/628-7160, fax 202/393-1816
<http://ruralco.org>
www.facebook.com/RuralCoalition
Twitter: @RuralCo

Board of Directors

John Zippert, Chair*
Federation of Southern Cooperatives/
Land Assistance Fund, Epes, AL

Georgia Good, Vice Chair*
Rural Advancement Fund
Orangeburg, SC

Dorothy Barker, Treasurer*
Operation Spring Plant, Oxford, NC

Tirso Moreno, Secretary*
Farmworkers Association of Florida
Apopka, FL

**Chilo Villarreal, Assistant
Treasurer*** Mexico City, Mexico

**Mily Trevino-Sauceda,
Assistant Secretary***
Organización en California de Líderes
Campesinas, Inc., Pomona, CA

**Darnella Burkett Winston,
Youth Representative***
Mississippi Association of Cooperatives
Petal, MS

Rudy Arredondo
National Latino Farmers and Ranchers
Trade Association, Washington, DC

Daisy Garrett
Rural Coalition Events Committee Chair
Jackson, MS

Savi Horne
Land Loss Prevention Project
Durham, NC

Starry Krueger
Rural Development Leadership Network,
New York, NY

**Anita Matt, Intertribal Agriculture
Council,** Moiese, MT

Maria Moreira
Flats Mentor Farm, Lancaster, MA

Rhonda Perry
Missouri Rural Crisis Center
Columbia, MO

Victor Quintana
At Large, Chihuahua, Mexico

Willard Tillman
Oklahoma Black Historical Research
Project Oklahoma City, OK

**Chukou Thao, National Hmong
American Farmer,** Fresno, CA

Carlos Marentes, Chair Emeritus
Border Agricultural Workers Project
El Paso, TX

Hubert Sapp, Chair Emeritus
Atlanta, GA

Patricia Bellanger, Emeritus
American Indian Movement
Minneapolis, MN

Marge Townsend, Emeritus
North American Farm Alliance
Windsor, OH

John Bloch, Emeritus
Markham Center, Montpelier, VT

Lorette Picciano, Ex-officio
Executive Director

*Executive Committee

The Rural Coalition, born of the civil rights and anti-poverty rural movements, has worked for 30 years to assure that diverse organizations from all regions, ethnic and racial groups and genders have the opportunity to work in solidarity on the issues that affect them all. The foundation of this work is strong local, regional and national organizations that work to assure the representation and involvement of every sector of this diverse fabric of rural peoples.

September 6, 2011

Chairman Julius Genachowski
Commissioner Michael Copps
Commissioner Robert McDowell
Commissioner Mignon Clyburn
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: WC Docket No. 10-90
WC Docket No. 05-337

The Rural Coalition and our diverse members, partners and allies urge the Commission to adopt common-sense reforms to the Universal Service Fund's High Cost Fund to ensure that the 9 million households that currently have no ability to access high-speed Internet service can do so as soon as possible—and can do so affordably.

With our 60 community based organizational members who represent more than 80,000 families in rural communities around the nation, we believe full access to high-speed internet is paramount to provide their communities with educational and economic opportunities that are unfortunately not available at present in far too many places.

We therefore support the proposal to create a Connect America Fund that will be focused on funding rural high-cost broadband projects where no such connectivity exists. Rural Coalition suggests the following specific additions to the proposal.

(1) Immediately ceasing any High Cost subsidies that support projects in geographic areas that are already served by unsubsidized providers. The priority for the High Cost Fund—and eventually the Connect America Fund—should be to connect the unconnected in rural America. Any dollar diverted elsewhere is a poor investment.

(2) Institute a cap on the total High Cost and Connect America Funds at the current level to prevent further increases in the USF fees that consumers pay.

(3) Apply the proposed new intercarrier compensation rate of \$.0007 to all voice consumers. To phase in the new rate based on technology, geography or any other criterion will put millions of consumers at a price disadvantage and take away money that would be better spent on broadband service.

The Rural Coalition and our diverse members and allies support these basic reforms, which we believe will allow the USF to operate more efficiently as it expands its scope to include expanding broadband access and adoption throughout America. Thank you for continuing to exhibit strong leadership on bringing ALL of rural America into the 21st Century.

Sincerely,

A handwritten signature in black ink that reads "Lorette Picciano". The signature is written in a cursive, flowing style.

Lorette Picciano
Executive Director