



503 N. Main, Ste. 310 – Pueblo, CO 81003
719-560-9897 – 1-888-799-1799 – Fax: 719-546-1558 www.action22.org

September 3, 2014

The Honorable Tom Wheeler, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20536

Dear Chairman Wheeler:

Rural communities throughout Colorado, like their counterparts across the country, face challenges virtually unknown to the residents of the nation's metropolitan areas. Schools, jobs, shopping and a host of other daily activities are a lot farther apart in our state's farm, ranch and mountain communities—and as a result, even the most basic services cost more to bring to our citizens.

This is particularly true when it comes to the challenge of providing rural residents with essential and critical telecommunications services. And just as it always has been more expensive to extend crucial land-line telephone service to sparsely populated rural regions, it has been even more challenging and at times cost-prohibitive to ensure rural citizens have access to the digital world of the 21st century.

Broadband access is at least as vital to rural communities as for the rest of society; the economies of our rural regions, the education of rural children and the public safety of our communities all, increasingly, depend on it.

That is why we are appealing to you and the commission to establish a much-awaited, urgently needed Connect America Fund (CAF) support mechanism for small rural carriers to help upgrade and maintain broadband-capable networks in our rural communities.

As you know, the FCC-regulated Universal Service Fund currently helps to sustain the small, rate-of-return-regulated telecommunications providers that connect many of our communities to the Internet, but that support comes with a big string attached: It is tied to actual provision of voice service. Meaning, of course, consumers in high-cost areas served by rural carriers are effectively required to take "plain old telephone service" just to obtain affordable broadband.

We believe this is a significant obstacle to the expansion of broadband to these communities. It makes it less likely rural consumers will opt for broadband because they will have to pay more than double the price for broadband only service from a small rural carrier. That not only undermines consumers' freedom of choice but also ultimately slows technological development.

We are aware of the Commission's ongoing efforts to modernize the Universal Service Fund itself and address its various long-standing issues, and we commend you for that initiative. Alongside that, we welcome some of the tremendous strides made in recent years by small, rural telecommunications providers in expanding rural broadband despite the daunting challenges. However, it has been an uphill battle, and we believe it is time to level the playing field.

The Honorable Tom Wheeler, Chairman
Federal Communications Commission
September 3, 2014
Page 2 of 2

The modernization of the Universal Service Fund provides an opportunity for the FCC to move forward immediately and adopt and implement a carefully crafted mechanism like the Connect America Fund to provide sufficient and predictable support for broadband-capable networks in areas served by smaller rural carriers. Shouldn't the citizens of rural Colorado and the rest of rural America enjoy the same basic choices in the marketplace—reasonably comparable services at reasonably comparable rates—as do other Americans?

As a foremost voice of economic vitality in Southern Colorado, encompassing a vast swath of our state and its rural communities, we urge you to address this pressing need and help us keep abreast of the Digital Age. Our ability to survive depends on it.

Sincerely,

A handwritten signature in black ink that reads "Kathy D. Worthington". The signature is written in a cursive, flowing style.

Kathy D. Worthington, Chair
Board of Directors
Action 22, Inc.

Cc: FCC Commissioners