



INDEPENDENT TELEPHONE & TELECOMMUNICATIONS ALLIANCE

May 1, 2008

The Honorable Tom Harkin  
Chairman, Senate Agriculture Committee  
Senate Russell 328A  
Washington, DC 20510

The Honorable Saxby Chambliss  
Ranking Member, Senate Agriculture Committee  
Senate Russell 416  
Washington, DC 20510

RE: Broadband Mapping Provisions of HR 2419

Dear Chairman Harkin and Ranking Member Chambliss:

The members companies of the Independent Telephone & Telecommunications Alliance (ITTA) write to oppose the inclusion of the provisions related to broadband data collection and mapping, in the Farm Bill. The members of ITTA share Congress' goal of making broadband, available to all Americans; these provisions, however, will do little to help further that goal, and in some cases my impede the deployment of broadband in rural areas.

The provisions being considered would require the collection and reporting of broadband availability by 9-digit ZIP code, as compared to the 5-digit ZIP code data currently collected by the FCC. While it would appear the 9-digit ZIP code data would be more granular and provide a clearer picture of broadband availability, that is not necessarily the case. As you know, 9-digit ZIP codes are designed primarily based on volume of mail received at a particular location, rather than any specific geography. For example, each Member of Congress is assigned a 9-digit ZIP code, while in more rural areas of the country a large geographic area could be covered by a single 9-digit ZIP code.

On March 19, 2008, the Federal Communications Commission (FCC) issued an Order to increase the precision and quality of broadband data collected and reported to the FCC. In that Order, the FCC, rejected specifically the use of 9-digit ZIP code data in favor of census tract data. Requiring 9-digit ZIP code data in this bill would run contrary to the FCC's efforts and place additional burdens on the resources of ITTA's members – resources that could be used to deploy broadband in rural areas.

ITTA is thankful for your leadership in strengthening the RUS provisions of the Farm Bill to ensure the availability of funds to assist in the deployment of broadband in unserved areas. We ask that you not include these provisions in the conference report, but rather allow the new data collection procedures recently adopted by the FCC to be implemented.

Sincerely,

Curt Stamp  
President  
Independent Telephone & Telecommunications Alliance

cc: Senate Conferees