



The voice of mid-size communications companies



USTELECOM
THE BROADBAND ASSOCIATION



Advocates for Rural Broadband



THE RURAL
BROADBAND
ASSOCIATION

February 27, 2017

The Honorable John Thune
Chairman, Senate Committee on Commerce,
Science, & Transportation
511 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Bill Nelson
Ranking Member, Senate Committee on
Commerce, Science, & Transportation
716 Hart Senate Office Building
Washington, DC 20510

The Honorable Greg Walden
Chairman, House Committee on Energy and
Commerce
2185 Rayburn House Office Building
Washington, DC 20515

The Honorable Frank Pallone, Jr.
Ranking Member, House Committee on
Energy and Commerce
237 Cannon House Office Building
Washington, DC 20515

Dear Chairman Thune, Ranking Member Nelson, Chairman Walden, Ranking Member Pallone:

Our associations are composed of well over a thousand companies and cooperatives that today offer robust broadband over networks spanning thousands of miles and reaching millions of rural consumers and businesses. Yet, extending these networks into parts of rural America still lacking access, delivering affordable services, and upgrading existing networks to allow rural consumers to benefit from the capabilities of broadband all remain formidable challenges. Just over a year ago, the FCC found that over 39 percent of Americans living in rural areas still lack access to advanced telecommunications capability. It was nearly seven years ago that the very first sentence of the FCC's National Broadband Plan declared that "[b]roadband is the great infrastructure challenge of the early 21st century." Indeed, that remains the case.

We are encouraged that one of the foremost priorities of the new Administration is to improve the infrastructure supporting the lives and livelihoods of all Americans. We are heartened by the recognition of how critical broadband infrastructure has been and will continue to be in improving Americans' collective well-being. Broadband has unleashed new capabilities in delivering health care, educating children, promoting public safety, and managing energy. It has enabled, and holds the promise of continuing to enable, the birth of entire new industries, in the process creating new jobs while also offering job seekers unprecedented access to employment opportunities presented in established industries. It facilitates the vast sharing of

knowledge and has spawned a “sharing economy.” Its position as an engine of economic growth is manifest.

All of these benefits of broadband, however, are only available to those who have access. In light of the benefits of universal broadband access coupled with its currently remaining an unrealized national ambition, we urge you to ensure that broadband infrastructure is a key priority in any new, comprehensive federal infrastructure investment program. And in making it so, we recommend several foundational principles to ensure that such broadband investment maximizes consumer benefits, ensures efficiency, produces results quickly, and is subject to accountability.

Any new broadband investment program must ensure sufficient resources to meet the challenges of delivering broadband to rural America. In order to truly realize universal broadband access by all Americans, in all regions of the nation, any funding should flow to areas currently lacking meaningful access to broadband services in order to establish and sustain such services. Adequate broadband services must meet reasonable and realistic service parameters – e.g., with respect to speed, latency, and price – and funding should flow to broadband investment that best meets national broadband goals regardless of the technology or technologies employed. To promote fiscal responsibility, funding should not be made available for duplicative networks that overbuild another provider’s existing broadband infrastructure.

In addition, leveraging existing federal expertise, gained through programs such as the Federal Communications Commission’s Connect America Fund, in promoting and sustaining broadband access will maximize speed-to-market and efficiency of distribution mechanisms, and minimize administrative burdens and costs. Strict yet reasonable accountability for broadband program investments is essential, and requirements should include build-out and performance targets. Federal and state tax regulatory, permitting, and other requirements should be coordinated and reconciled to maximize the benefits of the broadband investment program.

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We are at the beginning of an exciting new process to address our nation's critical infrastructure needs and to contribute to an improved way of life for all Americans. There is much work to be done in the coming months. We look forward to engaging with you on how to ensure that this work results in all Americans reaping the myriad benefits that new broadband infrastructure investment will foster.

Sincerely,



Genevieve Morelli
President
ITTA – The Voice of Mid-Sized
Communications Companies



Shirley Bloomfield
CEO
NTCA – The Rural Broadband Association



Jonathan Spalter
CEO and President
USTelecom – The Broadband Association



Kelly Worthington
Executive Vice President
WTA – Advocates for Rural Broadband



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The principles below are designed to ensure that any new federal infrastructure investment program supports broadband by maximizing consumer benefits, minimizing cost, producing results quickly, and including accountability.

Broadband a Priority – Any new federal investment program must prioritize broadband deployment.

Funding – Any new broadband investment program must ensure sufficient resources to meet the challenges of delivering broadband in rural America.

Targeted Support – Funding should flow to areas where it is needed to establish and sustain robust broadband services.

No Duplication – Funding should not be made available for duplicative networks to overbuild another provider's existing broadband infrastructure.

Service Standards – Broadband services must meet reasonable and realistic service parameters (e.g. speed, latency, price).

Balanced Approach – Funding should flow to whatever broadband investment best meets the program goals and requirements regardless of the technology or technologies employed.

"Speed-to-Market" – Leveraging existing federal expertise in promoting and sustaining broadband access will maximize speed-to-market and efficiency of distribution mechanisms.

Accountability – Strict accountability for broadband program funds is essential.

Governmental Support and Coordination – Federal and state tax, regulatory, permitting, and other requirements should be coordinated and reconciled to maximize the benefits of any broadband investment program.