

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
National Broadband Plan	)	GN Docket Nos. 09-47, 09-51, 09-137
	)	
Broadband Adoption	)	

**COMMENTS OF  
APPALSHOP  
ACCESS HUMBOLDT  
CALIFORNIA CENTER FOR RURAL POLICY  
CENTER FOR RURAL STRATEGIES  
MAIN STREET PROJECT  
MEDIA ACTION GRASSROOTS NETWORK  
MOUNTAIN AREA INFORMATION NETWORK**

Edyael Casaperalta  
Programs & Research Assoc.  
Center for Rural Strategies  
46 East Main Street  
Whitesburg, KY  
(956) 457-6126

December 2, 2009

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
National Broadband Plan	)	GN Docket Nos. 09-47, 09-51, 09-137
	)	
Broadband Adoption	)	

To: The Commission

**COMMENTS OF THE  
RURAL BROADBAND POLICY GROUP**

Appalshop, Access Humboldt, California Center for Rural Policy, Center for Rural Strategies, Main Street Project, Mountain Area Information Network, and Media Action Grassroots Network (collectively The “Rural Broadband Policy Group”) file these comments in the above captioned proceeding.

The attached “Comments – NBP Public Notice #16” in its present form as submitted, constitutes the comments and recommendations of the above listed organizations. The Rural Broadband Policy Group consists of organizations dedicated to rural broadband, rural development, or are otherwise involved in digital inclusion policies.

Respectfully submitted,

Edyael Casaperalta  
Programs & Research Assoc.  
Center for Rural Strategies  
46 East Main Street  
Whitesburg, KY  
(956) 457-6126

December 2, 2009

## **SUMMARY**

The Rural Broadband Policy Group commends the Commission for its interest in understanding the challenges and opportunities rural communities face in adopting broadband technology. The Rural Broadband Policy Group base these comments and recommendations on four principles that we believe should guide the development of the future of broadband in rural communities. We respectfully encourage the FCC to adopt the Rural Broadband Principles we have listed and to consider the following comments:

- 1. Communication is a fundamental human right.**
- 2. Rural America is diverse.**
- 3. Local ownership and investment in community is the priority.**
- 4. Network neutrality and open access are vital.**

In particular, the Rural Broadband Policy Group discusses access, literacy, and relevancy as important measures of adoption. We make the following recommendations:

- 1. Encourage the creation of incentives to wire all new construction.**
- 2. Encourage the creation of voucher programs for low-income families to afford broadband in the home.**
- 3. Encourage funding the work of community anchor institutions such as local community centers.**
- 4. Create structured literacy programs that teach on-line skills.**
- 5. Create a national broadband campaign.**

## **RURAL BROADBAND POLICY GROUP**

The Rural Broadband Policy Group is a growing national coalition of rural broadband advocates. The Rural Broadband Policy Group has two goals: 1) to articulate national broadband policies that provide opportunities for rural communities to participate fully in the nation's democracy, economy, culture, and society, and 2) to spark and kindle national collaboration among rural broadband advocates.

## **BROADBAND ADOPTION IN RURAL AMERICA**

As more every day activities and services move on-line, having the opportunity to use the Internet to its full potential becomes increasingly important. However, adopting Internet service is more than incorporating the Internet into our everyday lives simply because everything now has a website. It is also about shaping and informing the development of this technology in a way that benefits and complements our everyday lives and the future of our communities. Broadband adoption goes beyond the act of using broadband. Sustainable adoption is based on understanding and exploring, individually and collectively, the potential of broadband technology to improve our lives and the welfare of our collective communities.

While the national penetration rate is 63 percent, a 2009 study by the Pew Internet & American Life Project shows that less than half of rural residents have broadband in the home. Rural communities face unique challenges in increasing the broadband adoption rate. Rural areas are by definition geographically dispersed and less densely populated than urban areas, making delivery of public services more challenging. Furthermore, because rural communities have less access to the on-line world, this new form of social, cultural, economic, political, and democratic interaction lacks accurate representations of rural communities. Efforts to increase national adoption should reflect the concerns, interests, and vision of local communities. Rural communities should feel invested in using broadband technology and know they are vital contributors to developing its future.

As the Federal Communications Commission develops the National Broadband Plan, the Rural Broadband Policy Group commends the Commission for its interest in understanding the challenges and opportunities rural communities face in adopting broadband technology. The Rural Broadband Policy Group respectfully presents the following comments and recommendations regarding broadband adoption in rural communities:

### **1. Measuring Broadband Adoption**

Current adoption rates portray the percentage of the population using broadband via diverse mediums and from diverse locations (i.e. at home, on a smart phone, at the library, etc). A comprehensive study of adoption rates in rural communities, however, should inquire about factors beyond percentages. In order to adopt broadband technology, a community must have access to the technology, know how to use it, and find it useful. Thus, *adoption* should be measured by three variables: access, literacy, and relevancy.

- 1) Access – all people, regardless of their digital skills, geographical and socio-economic situation, should have the opportunity to access broadband technology in a way that is useful for their own life plans.
  - a. Infrastructure access – broadband service should be available for all people regardless of where they live.
  - b. Affordable access – broadband service should be affordable for all income levels.
  - c. Hardware access – the equipment necessary to use broadband (i.e. computers, routers, etc) should be affordable for all income levels.

- d. Adequate access points– Whether at home, work, library, school, public computer center, local community center, etc., all people should have access points where they may use the Internet in a meaningful way and in an adequate environment (i.e. multi-cultural, multi-language).
- 2) Literacy – In order to use broadband technology to its fullest potential, people need to know how to use digital hardware/software (computers, routers, smart phones, video game consoles, etc.), and how to navigate the Internet.
  - 3) Relevancy – If the Internet is not relevant to their everyday lives, people are less likely to adopt broadband technology. A broadband “adopter” understands the benefits the technology brings to her life and is invested in exploring and expanding those benefits. To increase relevancy, broadband content must be multi-cultural, multi-lingual, and reflect the interests of local groups and affinity groups. For example, rural communities, immigrant populations, and diabetes patients.

## **2. Cost of digital exclusion**

As more every day activities and services more on-line, having the opportunity to use the Internet to its full potential becomes increasingly important. Remaining disconnected could affect the housing, employment, educational, civic engagement, and social opportunities of rural communities.

For millions of U.S. residents, broadband access is either unavailable or unaffordable. Yet, people need access to the Internet to find a new job, manage their finances, obtain news alerts, apply to college, access public assistance, and schedule immigration appointments. E-government and public assistance services including the following are nearly exclusively accessible online:

- \* Medicaid/Medicare
- \* SSI
- \* TANF
- \* Social Security
- \* Food Stamps
- \* HUD programs
- \* Head Start
- \* Immigration

For rural community members—no online access can mean a drive of more than two hours to the nearest city or county seat to access in-person support for these services. As schools begin to use online tools that track academic progress, families that remain unconnected will be further disadvantaged in contributing to the academic success of their children. Not having access (as defined above) could mean that parents cannot utilize a new tool to help ensure the academic growth of their child. It often prevents Students from being able to obtain an Associates or Bachelors Degree as many Community Colleges and Four-Year partner schools offer the majority of their classes “on-line.” The FAFSA (Free Application for Federal Student Aid) is an online process as are the majority of college applications. Big Box Retail—which is prevalent in rural areas—like Best Buy and Target only accept online applications.

Furthermore, if rural communities remain unconnected to the Internet, broadband technology could develop in a way that excludes them, intensifies the digital divide, and propagates erroneous conceptions about rural America. Rural communities must be part

of the national conversation about broadband adoption so this conversation will include rural concerns, build on local assets, and produce content that is culturally accurate and relevant.

### **3. Barriers to adoption**

Beyond the lack of access to the service, rural communities face additional barriers to adopt broadband technology. Although the list of barriers below is not exhaustive, the Rural Broadband Policy Group offers comments on the following:

- 1) Need for on-line literacy – although many rural communities are familiar with the opportunities of broadband, lack of access to the technology contributes to the limited experience many rural residents may have with the technology. Using broadband to its full potential is not as self-explanatory as making a telephone call, and e-mail does not encompass the full potential of broadband technology. There is a need in rural communities for computer and on-line literacy programs. People need to know how to use and maintain the hardware and software, and how to navigate the Internet effectively and safely in order to reap the full benefits of broadband technology.
  
- 2) Lack of adequate access points – the need for on-line literacy is coupled with a need for adequate access points from which people can access broadband technology in their own language and in a supportive environment that addresses their interests.

Centro Cultural, in Moorhead, Minnesota is a local community center that provides the community with a valuable public computer lab equipped with ten computers all with Internet access. Because of the demand, Centro Cultural has seen an increase in electricity bills, experienced additional expenses in maintaining equipment, and had to hire a full time employee to run the lab. When community members request assistance, Centro staff teach them how to find and apply for jobs, grants, and scholarships on-line, and to take advantage of on-line civic engagement opportunities (such as voting and 2010 Census resources). Centro's Computer Lab has also been successful in reaching out to low-income, high-risk youth about the opportunities that exist on the Internet (social networks, educational, employment, scholarships, civic engagement, etc.). In working with diverse rural youth such as new Americans, refugees, and immigrants, Centro Cultural has found that it is difficult to provide them with all of the resources that could make their broadband experience successful and meaningful. For example, keyboards become a barrier when the user does not speak English. Centro staff recognizes that accessing the Internet in an environment that is multi-cultural and multi-lingual creates a more meaningful experience for users of diverse cultural and linguistic backgrounds.

- 4) Cost – the cost of broadband access, particularly high in rural areas (because of the lack of infrastructure and providers, coupled with high poverty rates and low employment opportunities) is a significant barrier for rural residents

to adopt broadband technology. In the current economic climate, people cannot afford to pay extra bills. Although broadband might be seen as a necessary service, hidden and increasing fees discourage a family that is barely making ends meet. Broadband service should be affordable for all income levels.

#### **4. Overcoming barriers to adoption – Recommendations**

The Rural Broadband Policy Group respectfully makes the following recommendations to the Commission in its efforts to overcome adoption barriers in rural communities:

- 1) Infrastructure Access – Coordinate efforts with the Department of Housing and Urban Development, the United States Department of Agriculture, and other appropriate rural housing authorities to require that all new construction in rural communities be wired and broadband-capable.

Encourage the federal government to create grant/loan incentives for housing developers to wire all new homes and apartment buildings.

- 2) Affordable Access – Encourage the federal government to create a voucher program that would allow low-income families living on Section 8 Housing to afford broadband in the home.

All Title I schools (schools that qualify for Free and Reduced Lunch programs) and families who receive free and reduced meals should also be eligible for vouchers to cover the cost of home broadband.

The Bureau of Migrant Head Start provides childcare and a comprehensive program of health, parent involvement, and social services for preschool children of low-income migrant and seasonal farm workers. Migrant children and families should be able to receive assistance with affordable Internet access and digital literacy classes as a component of Migrant Head Start.

- 3) Adequate Access Points – Encourage the federal government to provide funding for the work of community anchor institutions like Centro Cultural, which is a valuable broadband access point and provides an adequate environment for rural Moorhead to learn about and take advantage of the opportunities broadband offers.
- 4) Literacy – Create structured literacy programs that provide target groups with on-line skills that can enhance their everyday lives and encourage them to adopt broadband technology sustainably. These programs could be tailored specifically for farmers, educators, nurses, English-learners, and other demographic groups.

- 5) Relevancy – As with the Rural Electrification Movement, create a national campaign, including public service announcements, that provides examples of how broadband could enhance everyday life and that promotes adoption of broadband technology.

## **RURAL BROADBAND PRINCIPLES**

The Rural Broadband Policy Group upholds the following principles to articulate broadband and Internet policies for rural America.

### **1. Communication is a fundamental human right.**

Lack of access to broadband denies rural areas the fundamental human right to communicate. Without broadband, rural communities are further isolated from economic and civic participation, thus, diminishing antipoverty efforts. Economic distress in rural communities – lack of jobs, inadequate education, poor healthcare, outflow of local talent, etc. – is exacerbated by the inability to communicate. Broadband is no longer a luxury but a vital service necessary to fully participate in the nation’s democracy, economy, culture, and society. As the nation moves forward in new ways with advanced digital communications, broadband access becomes a fundamental human right. Observing and protecting this right will provide more resources for rural areas to improve economic conditions and advance with the rest of the nation.

### **2. Rural America is diverse.**

Rural America is diverse in terrains, cultures, foods, peoples, and knowledge. There is no one-size-fits-all solution for all rural communities. Tribal lands are an example of the diverse needs of rural areas. Tribal sovereignty includes the right of each

Native Nation to govern relationships and territory within tribal homelands. As with each tribe, each rural community has its own land-based network of knowledge. Therefore, the diversity of rural America must be represented in national broadband policies. Priority should be given to policies that support diverse technologies, develop locally produced broadband content, encourage adequate data collection methods, and respect the unique characteristics of each community.

### **3. Local ownership and investment in community is the priority.**

Policies that prioritize local ownership invest in the success of community. Absentee-ownership of broadband infrastructure and service has failed to serve rural communities in part because outside corporations fear rural areas will not return profits available from wealthier, more densely populated markets. Local ownership of broadband infrastructure and service can address problems ignored by absentee-owners such as lack of broadband access, slow speeds, limited (if any) provider choice, open access, training and adoption of technology, data collection, and aggregation of demand. Rural communities must own local communications infrastructure, not only to boost their local economies, but to ensure that broadband is accessible to every rural community in the nation.

### **4. Network neutrality and open access are vital.**

Rural areas generally have less access to all forms of media, not just broadband. Therefore, net neutrality, which establishes the principle of open and unfiltered access to information, is vitally important for rural communities. The ability to originate content on an equitable and symmetric basis is also necessary to meet the public interest.