

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
)	
Economic Opportunity)	

COMMENTS OF

**APPALSHOP
CALIFORNIA CENTER FOR RURAL POLICY
CENTER FOR RURAL STRATEGIES
HOUSING ASSISTANCE COUNCIL
INSTITUTE FOR LOCAL SELF-RELIANCE
MAIN STREET PROJECT
MEDIA ACTION GRASSROOTS NETWORK
MEDIA LITERACY PROJECT
MOUNTAIN AREA INFORMATION NETWORK**

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December 4, 2009

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To: The Commission

**COMMENTS OF THE
RURAL BROADBAND POLICY GROUP**

Appalshop, California Center for Rural Policy, Center for Rural Strategies, Housing Assistance Council, Institute for Local Self-Reliance, Main Street Project, Media Action Grassroots Network, Media Literacy Project, and Mountain Area Information Network (collectively The “Rural Broadband Policy Group”) file these comments in the above captioned proceeding.

The attached “Comments – NBP Public Notice #18” 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,

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SUMMARY

The Rural Broadband Policy Group commends the Commission for its interest in understanding the relationship between broadband and economic opportunity in rural communities. 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 expanding the definition of “community hubs,” their vital role in ensuring rural residents enjoy the economic opportunities of the Internet, and the valuable contributions of locally owned networks to the economies of rural communities. We make the following recommendations:

- 1. Expand the definition of “community hub” to include local community centers.**
- 2. Develop recommended standards for the operation of community hubs regarding hours, transportation, accommodations, and special needs.**
- 3. Support locally owned networks.**

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 AND ECONOMIC OPPORTUNITY IN RURAL AMERICA

Rural America is vast and diverse. Sixty million Americans, or about 20 percent of the population, live in the countryside on 80 percent of the nation's land. The predominant feature of rural areas is the land: mountains, plains, coastlines, deltas, and other geographic characteristics. Rural cultures and economies grow in response to place, and in rural areas place is defined by land. Rural areas are by definition geographically dispersed and sparsely populated, making delivery of public services more challenging. Many rural communities suffer from lack of basic infrastructure, little economic investment, scarce employment opportunities, outmigration, and poverty.

But the health of the nation as a whole is directly linked to the wellbeing of rural America. Rural America provides the food and natural resources upon which healthy cities rely, and urban areas are a primary market for rural goods. The United States cannot build a healthy economy without considering the interdependent nature of rural and urban areas. When America's rural communities lag behind, the entire nation feels the effects.

Broadband technology could be part of the solution for addressing the economic and social difficulties rural communities face. Broadband access would allow rural America to reap the benefits of telehealth, e-democracy, telecommuting, higher education distance learning, IT development, e-business and greater connection to the global economy. Broadband could be a powerful tool in revitalizing economic opportunity in rural communities by supporting locally driven investment.

The promises of broadband in revitalizing rural economy are plenty. But to fulfill those promises, rural communities must participate in creating the vision of how broadband technology boosts local economies. As the Federal Communications Commission develops the National Broadband Plan, the Rural Broadband Policy Group commends the Commission for its interest in understanding the relationship between broadband and economic opportunity in rural communities. The Rural Broadband Policy Group respectfully presents the following comments and recommendations regarding the relationship between broadband and economic opportunity in rural communities.

I. Community Hubs

People need access to the Internet to find jobs, manage their finances, get news, apply to college, access public assistance, and schedule appointments with government agencies such as U.S. Citizenship and Immigration Services. Yet, a disproportionate number of rural residents do not have broadband access either in their homes or via a community institution such as a school or library. In such cases, “community hubs” play a vital role in providing rural community members with access to broadband technology.

Community hubs can be spaces such as churches, post-offices, barbershops, and local community centers. The Rural Broadband Policy Group encourages the Commission to expand its definition of “community hub” to include local community centers like Centro Cultural in Moorhead, Minnesota. Centers like Centro Cultural are vital in providing broadband access and helping community members explore on-line economic opportunities such as applying for a job in a culturally supportive environment. As local ventures, community hubs like Centro Cultural help bring employment

opportunities and retain IT talent that would otherwise outmigrate.

Centro Cultural 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 has 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. As youth come to Centro, they interact with youth and adults of all ages. They teach each other computer and on-line skills – an experience they would otherwise miss due to their social standing and economic disadvantage. 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-generational, multi-cultural, and multi-lingual creates a more meaningful experience for users of diverse cultural and linguistic backgrounds.

To ensure that all rural community members have access to free Internet in a supportive environment, the Rural Broadband Policy Group has developed a list of recommended standards for places and organizations that will serve as “community hubs.” We respectfully encourage the Commission to consider the following recommendations:

1) Hours

- Regularly open beyond 9 – 5 business hours
- Also open on weekends and holidays
- Offer tiered time limits for computers:
 - Dedicated computers that can be reserved for 2 – 3 hours
 - Computers with one-hour, 30-minute, and 15-minute limits

2) Transportation

- Within walking distance where there is no public transportation

3) Family and Youth Friendly

- Offer on-site childcare
- Have youth workers or counselors specifically trained to work with youth and adolescents
- Have healthy and affordable snacks and meals available
- Have staff available to teach computer basics

4) Accommodations

- Offer computers dedicated specifically to job searches
- Offer computers dedicated specifically to e-government and public assistance services such as Medicaid/Medicare, Food stamps, SSI, HUD

programs, TANF, Head Start, and Immigration

- Offer computers dedicated specifically to health and health-care-related searches (Web M.D., claims for prescriptions, insurance claims, etc.)
- Offer computers dedicated to use in languages other than English
- Have special software and keyboards for non-Latin languages
- Provide free printing
- Have carousels or docking-stations available for laptops (with free Internet and printing)
- Have computer hardware and parts that are child-tested and proven to withstand heavy use

5) Special Needs

- Have multi-lingual staff
- Have specialists who can work with multiple computer and on-line literacy levels
- Have handicap-accessibility
- Offer 1-2 terminals adapted for use by the blind, deaf, and hard of hearing
- Provide workstations where users with disabilities have space/seating to work comfortably with assistance from PCAs and other attendants
- Offer hours specifically for seniors
- Have staff trained to work with homeless adults

II. Broadband's Role in Regional Economic Development

The current market-driven policies for the build-out of broadband networks do not adequately serve rural communities. The federal government defines rural areas as regions lying outside metropolitan markets. Thus rural areas by definition face difficulties if the only choices are market-driven. Years of telecom-industry consolidation have produced a “brain drain” of network expertise and technical resources from rural areas and concentrated these resources in urban hubs. Today, there is no technical reason for the urban consolidation of network resources, and a compelling argument can be made that local broadband networks are more cost-effective and efficient, both in their construction and in their operation.

Like community hubs, locally owned networks (LONs) are vital for providing affordable, reliable, and adequate access to broadband in a way that keeps the interests and concerns of rural communities at heart. Not only do LONs offer a cost-effective option for broadband development in rural areas, they also contribute significantly to the rural economy by creating jobs and promoting social capital and innovation. The Rural Broadband Policy Group encourages the Commission to consider the following comments in support of the valuable role of locally owned networks in helping rural communities access the full range of economic opportunities of broadband technology. Enlightened federal policies could empower a new generation of local networks and reverse the effect of absentee-owned telecom networks on rural areas.

1) Cost-effective

Locally-owned networks (LONs) are more cost-effective to deploy and to operate.

Advanced digital networks are more affordable, scalable, and easier to manage

and operate than ever before. Meanwhile, major telephone and cable firms are investing in expensive “deep packet inspection” (DPI) technologies to expand their advertising and marketing businesses.

While basic DPI applications can be used for network management, most DPI investments aim to monitor and track how subscribers use the Internet in order to target advertising more effectively. Because most LONs do not include DPI subscriber-tracking in their business models, they can deploy and operate advanced broadband networks more cost-effectively.

2) Job Creation

LONs are less likely to out-source critical functions like customer-service and technical support, thereby expanding the local job-base and providing social capital benefits such as mentoring local youth and assisting local innovators and entrepreneurs.

3) Social Capital and Innovation

LONs bring advanced IT expertise to the communities they serve. Broadband networks should not just “pass through” rural areas and low-income neighborhoods, they should be part of these communities in order to achieve the optimum economic and community development that broadband technology offers. Social capital formation should be considered integral to any economic-impact calculus as the federal government reforms our national broadband

policies. Discounting or ignoring social capital's role as a dynamic driver of innovation, economic development, and job-creation can lead to market distortions and reduced competition by privileging some business models over others. Policymakers should remember that two of the greatest innovations in the history of U.S. telecommunications came from rural America: The first telephone switch was patented in 1891 by an inventor in Kansas; the Carterfone was patented in 1959 by a Texas cattle-rancher. The former paved the way for “common carrier” networks, while the latter gave us innovations such as facsimile and answering machines and data modems. Common carrier and Carterfone rules are at the heart of net neutrality.

4) Digital Literacy and Small Business Development

Broadband provides substantial benefits to both rural consumers and to the overall rural economy. Broadband can stimulate local economic development, as well as create jobs, and increase community-assets through small business creation. Affordable, accessible, high-speed Internet connectivity combined with digital literacy and e-commerce education and training will increase opportunities for small business development--a key to any kind of economic growth--in rural areas.

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.