

December 14, 2010

Chairman Julius Genachowski
Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Atwell Baker
Federal Communications Commission
445 12th Street SW Washington, DC 20554

Re: GN Docket No. 09-191, WC docket No. 07-52, GN Docket No. 10-127

Dear Chairman Genachowski and Commissioners:

**Rural Communities deliver a simple message to the FCC:
Protect rural consumers – Clarify your authority and
Implement strong Net Neutrality rules.**

As more everyday services move on-line, the opportunity to use the Internet to its full potential becomes a necessity. In rural communities, access to broadband offers opportunities for education, telemedicine, economic development, and social, cultural, and political participation.

As rural teachers, doctors, Internet Service Providers, business owners, voters, and community members, we need the Federal Communications Commission to protect our rights as Internet consumers and innovators. To this end, we respectfully ask the FCC to reclassify Internet Service under Title II, and to draft and implement stronger Net Neutrality rules.

We urge the Commission to listen to our requests:

1) Protect the Rights of Wireless Internet Consumers.

According to a 2010 study by the Pew Research Center, only half of rural residents have high-speed Internet access in their home. There are multiple reasons for this: lack of Internet infrastructure, lack of Internet providers, high cost of service, high cost of computer equipment, a need for computer literacy, etc. The reality is that many rural communities simply do not have access to Wired Internet service. Thus, Wireless Internet service is a lifeline in remote areas. Wireless Internet infrastructure, cell phones, and cell phone plans are more affordable; cell phones are easier to use and there are more cell phone providers than Wired Internet providers in rural areas. That is why Wireless Internet services and the consumers who rely most on Wireless service deserve the same protections afforded Wireline services. We need you to implement strong network neutrality rules to protect the Wireless Internet and the rights of Wireless Internet consumers.

2) Don't Favor Big Companies Over Small Rural Businesses and Innovators.

"Paid Prioritization" would favor big companies over small rural businesses and innovators. Fortune 500 companies will pay to ensure that their websites load faster while small rural businesses, who are less able to afford the "fast lane" fees, will be left behind. Keep the Internet the level playing field that allows rural businesses and innovators to succeed.

3) Don't Allow Telecommunications Companies to Charge Us Extra.

"Paid Prioritization" could also allow telecommunications companies to charge consumers or content providers extra for getting to a website faster. Content providers paying these "tolls" would then have an incentive to pass the cost along to their own customers. When consumers buy Internet service, we expect to pay for the full Internet. Defend our right as consumers to use it fully and freely.

4) Rural Internet Service Providers are Happy to Practice Network Neutrality.

The survival of rural ISPs depends on being open to all consumers. In contrast, big telecommunications companies cherry-pick whom to serve and leave rural areas largely unserved. Openness is a core principle for rural Internet Service Providers. Strong Net Neutrality rules help them stay in business and provide service to rural communities. Furthermore, because rural ISPs will need some form Universal Service Fund support to stay in business, they will happily abide by the Net Neutrality rules that the Commission implements in order to secure those subsidies.

5) Be Our Advocate: Reclassify Internet Service Under Title II to Clarify the Authority of the Commission.

Rural communities were hurt when the authority of the FCC was questioned earlier this year. We need the FCC as an advocate and defender of the interests of rural communities as we seek equal access to high speed Internet. By reclassifying Internet access service as a Title II service, the FCC clarifies its authority to implement the National Broadband Plan, which will help rural communities prosper.

Furthermore, we need the FCC as an advocate in the strategic and beneficial reform of the Universal Service Fund. Just as rural telephone and electric companies required subsidies to provide service, the millions allocated in the Universal Service Fund can help bring Internet access to rural people. By reclassifying Internet access service under Title II, the FCC maintains its authority, and rural communities have an agency with the authority to advocate for our concerns.

6) Support Local Internet Service Providers and Create Jobs in Rural Communities.

Big telecommunications companies have failed in extending Internet service to rural areas. They claim it is costly and not profitable. We are tired of waiting for AT&T, Verizon, and Comcast. Instead of trying to bring in an outside solution, the FCC should help and encourage local providers, who are eager to invest in their own communities, to offer competitive Internet service and create jobs. Reclassifying

Internet service under Title II, will allow the Commission to advocate more readily for a new vision of the Universal Service Fund that can provide subsidies to local Internet Service Providers.

The Bottom Line

The rules that Chairman Genachowski proposed are too weak. They do not adequately protect the rights of rural Internet consumers, and do not fully protect the Wireless Internet. His proposal does not establish the authority of the FCC, does not support local Internet Service Providers, and misses an opportunity to encourage job creation in rural communities.

As rural consumers, Internet Service Providers, and innovators, we respectfully request that the Federal Communications Commission establish its authority by reclassifying Internet Service under Title II, and draft and implement stronger Net Neutrality rules that treat Wireline and Wireless Internet equally, prohibit "Paid Prioritization," and focus on protecting consumers. Without these provisions, the Commission should not move forward with Chairman Genachowski's proposal.

We sincerely thank the Commission for your tireless efforts, and we hold you as advocates for our concerns. We look forward to collaborating with you in the development of strong Network Neutrality rules that enable all Americans, including those of us in rural America, to fully benefit from this technology.

Respectfully Submitted,

Access Humboldt, *Humboldt, CA*
Appalshop, *Whitesburg, KY*
California Center for Rural Policy, *Arcata, CA*
Center for Rural Strategies, *Whitesburg, KY*
Centro Cultural de Fargo/Moorhead, *Moorhead, MN*
Housing Assistance Council, *Washington, DC*
Institute for Local Self-Reliance, *Minneapolis, MN*
Main Street Project, *Minneapolis, MN*
Media Literacy Project, *Albuquerque, NM*
Missouri Farmers Union, *Langdon, MO*
Mountain Area Information Network, *Asheville, NC*
Partnership of African American Churches, *Institute, WV*
Redwood Coast Rural Action, *Bayside, CA*
Rural School and Community Trust, *Arlington, VA*
Sustainable Northwest, *Portland, OR*
The People's Press Project, *Fargo, ND*
The Watershed Research and Training Center, *Hayfork, CA*
YouthBuild USA, *Somerville, MA*