SHLB
SCHOOLS, HEALTH & LIBRARIES
BROADBAND COALITION

July 3, 2014

Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly
Federal Communications Commission
445 12th St, SW
Washington, D.C. 20554

Re: *Ex Parte* presentation in WC Docket No. 10-90

Dear Chairman Wheeler and Commissioners,

The Schools, Health & Libraries Broadband (SHLB) Coalition understands that the Federal Communications Commission (FCC) is scheduled to adopt an Order on July 11 that would set a budget and a methodology for selecting winning applications for the Connect America Fund (CAF) rural broadband experiments. The SHLB Coalition has strongly supported the prior proposals to make CAF funding available to deploy high-capacity broadband service to community anchor institutions in rural areas, and several SHLB members submitted "Expressions of Interest" proposing to do just this.

We are thus distressed to hear about the possibility that no funding for these Rural Broadband Experiments will be made available to build high-capacity networks for anchor institutions, as initially proposed. Community anchor institutions need high-capacity broadband to provide essential educational and informational services that their communities demand, especially to vulnerable and "at-risk" populations. The 4 Mbps standard identified for residential consumers is far too low for most community anchor institutions; the National Broadband Plan Goal #4 called for anchor institutions to receive 1 Gbps capacity – 250 times more than the 4 Mbps standard.[1] CAIs are "multi-user environments" that may contain a dozen to several hundred

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[1] Even if the FCC increases the minimum speed to 10 Mbps as proposed in the latest Connect America Fund Order and Further Notice of Proposed Rulemaking (released June 10, 2014), this standard would remain 100 times less than what was recommended for anchor institutions in the National Broadband Plan.

Internet-connected computers. CAIs also provide wireless access to those who bring their own devices to the institution.

The evidence shows that anchor institutions in rural areas are suffering a severe shortage of broadband capacity. The recent submission by NTCA-The Rural Broadband Association in the E-rate Docket on July 1 shows that 25% of schools in its members' regions do not have fiber to the premises, and 53% of libraries do not have fiber to the premises.[2] The situation in most of the country's rural areas is undoubtedly much worse.[3] Anchor institutions in the areas not served by rural cooperatives receive generally have even less access to fiber facilities. The recent survey in California of all public libraries (including urban, suburban and rural) showed that an astounding 71% of libraries connect to the Internet at speeds of 20 Mbps or less.[4] A study of the anchor institutions in Kansas (a highly rural state) found that (as of early 2012), **70% of anchor institutions were connected through an inadequate T-1 (1.5 Mbps) connection.**[5]

Anchor institutions in rural areas provide enormous benefits to their communities. To give just a few examples:

- With proper broadband connections, community colleges can share video and other high-volume educational content among their disparate campuses and regional locations in their state, across the country and around the globe. Expanding access to educational materials and programs reduces inefficiencies and redundancies within and among community colleges. The need to access high-quality video material over high-speed broadband connections is critical – especially for science, medical and health profession courses where special techniques, visual recognition and simulations are paramount.

- Community media centers in rural areas are often the only local source of news and information for TV, radio and online programming. Access to next generation broadband service is essential for the timely gathering and distribution of local media content for public, education and government purposes.

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[2] See, ex parte filing of NTCA – The Rural Broadband Association in Docket No 13-184, July 1, 2014, available at http://apps.fcc.gov/ecfs/document/view?id=7521357849.

[3] According to the National Broadband Plan, the price cap companies serve about 65% of the nation's housing units, but the small telephone companies receive twice as much USF support as the price cap companies. This is one of the reasons why the broadband deployment in areas covered by the price cap companies lags behind the levels of broadband in areas served by NTCA members. See, the National Broadband Plan, page141.

[4] "High-Speed Broadband in California Public Libraries: An Initiative of the California Public Library: Needs Assessment and Spending Plan," submitted Feb. 1, 2014, available at http://www.library.ca.gov/lds/docs/Public_Library_Broadband_Assessment_2014.pdf. Many of the quotes from librarians in this report cite to the difficulty of obtaining higher bandwidth services in rural areas.

[5] "Building the Broadband Future: The Communications Needs of Kansas Schools, Libraries and Hospitals," issued by the Kansas Department of Commerce, written by CTC Technology & Energy, Jan. 31, 2013, p. 28, available at http://www.ctcnet.us/KansasCAINeeds.pdf.

- Rural health clinics have a dire need for greater broadband connectivity to connect to urban hospitals so that they clinics can bring high-quality telemedicine to rural areas. Broadband connectivity also helps health organizations comply with federal requirements to store and maintain electronic medical records.

We urge the Commission to make a portion of the proposed funding available to upgrade the broadband capacity for anchor institutions in rural areas. Ensuring anchor institutions are connected through these rural experiments will improve the business case for broadband providers and likely increase competition and the sustainability of these investments in these unserved areas.[6] Conversely, excluding anchor institutions from this funding will exacerbate the "digital divide," both because broadband providers may not see a business case for deployment, and because anchor institutions will not have the opportunity (through digital literacy training and otherwise) to spread the benefits of broadband generally to the community.

Both the National Broadband Plan and the Broadband Technology Opportunities Program (BTOP) recognized that anchor institutions are vitally important to serving the needs of the entire community for expanded broadband connectivity. We urge the FCC to follow through on the National Broadband Plan Goal #4 and to use at least some of the CAF funding to promote high-capacity broadband deployment to anchor institutions in rural areas.

Sincerely,

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[6] See Paragraph 96 of the Technology Transitions Order, released Jan. 31, 2014. ("We seek to examine whether and how the business case for deployment in rural areas, including Tribal lands, can be improved by securing the participation of anchor institutions to serve as key customers of the next generation networks.")