

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

In re: )  
 )  
Rural Broadband Strategy ) GN Docket No. 09-29  
 )  
 )  
 )  
 )  
 )

**COMMENTS**



Matthew M. Polka  
President and Chief Executive Officer  
American Cable Association  
One Parkway Center  
Suite 212  
Pittsburgh, Pennsylvania 15220  
(412) 922-8300

Ross J. Lieberman  
Vice President of Government Affairs  
American Cable Association  
4103 W Street, N.W., Suite 202  
Washington, DC 20007  
(202) 494-5661

Christopher C. Cinnamon  
Bruce E. Beard  
Jeremy M. Kissel  
Heidi I. Schmid  
Cinnamon Mueller  
307 North Michigan Avenue  
Suite 1020  
Chicago, Illinois 60601  
(312) 372-3930

Attorneys for the American Cable  
Association

March 25, 2009

## **I. Introduction.**

The American Cable Association submits these comments in response to the Commission's Public Notice seeking suggestions regarding the substantive recommendations to be included in the Commission's Report to Congress describing a comprehensive rural broadband strategy.<sup>1</sup>

ACA members are uniquely positioned to help the government ensure access to advanced telecommunications and information services to all Americans, particularly in the rural areas where they already serve, and ACA welcomes the opportunity to assist the Commission in formulating a rural broadband strategy.

To that end, and in an effort to develop a comprehensive national broadband plan, ACA urges the Commission to recommend a rural broadband strategy that includes Federal grant and loan programs that allow operators serving small markets and rural areas to apply for and receive money for last-mile and middle-mile projects. The FCC should further recommend that these programs have an application process that (i) is streamlined for applicants who are small and medium-sized operators or those requesting relatively minimal funding; (ii) is open and transparent; and (iii) gives weight to existing entities that have financial, managerial, operational, and technical experience running broadband networks in smaller markets and rural areas.

**American Cable Association.** Small markets and rural areas across the country are receiving video, high-speed broadband, and phone services from more than 900 small and medium-sized independent operators represented by the ACA.

---

<sup>1</sup> *Comment Date Established for Report on Rural Broadband Strategy*, Public Notice, DA 09-561, GN Docket No. 09-29 (rel. Mar. 10, 2009).

ACA's membership comprises cable, phone, and fiber-to-the-home operators and municipalities who deliver affordable basic and advanced services, such as high - definition television, next generation Internet access, and digital phone, to more than 7 million households and businesses, some of whom have no other means of receiving these vital services.

ACA member operators range from family run businesses serving a single town, to multiple system operators with small systems in small markets. More than half of ACA's members serve fewer than 1,000 subscribers.

**II. Any rural broadband strategy should include Federal broadband grant and loan programs that allow operators serving small markets and rural areas to apply for and receive money for last mile and middle mile projects.**

The Commission should recommend a rural broadband strategy that includes Federal grant and loan programs. These programs should assist small and medium-sized operators in building last-mile infrastructure to deliver broadband service to rural areas, including currently unserved households. The grant and loan programs should also allow these operators to build middle-mile infrastructure, which will increase broadband speeds and lower operational costs by bringing more Internet fiber backhaul to rural communities.

Permitting broadband grant and loan funds to be spent on these sorts of projects would have a profound impact on broadband deployment in sparsely populated and geographically challenged communities where current economics making providing high-speed Internet impossible.

**III. Recommendations for the broadband grant and loan application process.**

In addition to suggesting that federal grant and loan programs should be included in a rural broadband strategy, the Commission should give recommendations on the program's application process to ensure that funding is accessible to small and medium-sized operators who already provide service in smaller markets and rural areas.

**(a) The broadband grant and loan application process should be streamlined.**

A Federal broadband grant and loan application process should be streamlined for small and medium-sized operators, and operators that seek funding for projects of a relatively minimal amount. Small businesses have less financial and administrative resources to devote toward complicated applications. A streamlined process for small entities would ensure that the application process is fair to all interested parties, regardless of size. Moreover, many ACA members report that they can deploy broadband to unserved areas, and increase the upload and download speeds where service is available, for no more than a few million dollars. In order to ensure that these smaller projects do not get bogged down in red tape, there should also be a streamlined application and approval process for projects of a relatively minimal cost.

Streamlining the broadband grant and loan application process will help achieve the goal of widespread rural broadband deployment by allocating limited resources in an effective and efficient manner.

**(b) The broadband grant and loan application process should be open and transparent.**

The broadband grant and loan application process should be open and

transparent. Placing broadband grant and loan application forms, instructions, pending applications, and award notices online is one way to achieve this goal. Such access will allow the public to see what broadband grant and loans are funding, and whether the broadband funds are going to the rural areas where it is most needed. Guidelines that ensure an open and transparent process should be included in the Commission's recommendations.

**(c) The broadband grant and loan application process should give weight to existing entities with experience providing broadband services.**

In rewarding grants, Federal agencies should give weight to existing entities that have experience providing broadband services in smaller markets and rural areas. Entities that offer or have offered broadband services possess financial, managerial, operational and technical experience, and can leverage existing networks and resources to maximize the benefits of any broadband grant. In other words, Federal agencies should give consideration to existing broadband providers during the application process.

**IV. Conclusion.**

The Commission has an opportunity to develop a rural broadband strategy that will ensure that all Americans have access to broadband services. In order to accomplish that goal, the Commission must make sure that any rural broadband strategy includes Federal broadband grant and loan programs that allow small and medium-sized operators to serve rural areas by building last-mile and middle-mile infrastructure. Moreover, the broadband grant and application process needs to be

streamlined, open and transparent, and give weight to existing broadband service providers.

ACA members are uniquely situated to help carry out the goals of a rural broadband strategy, and stand ready to help the Commission develop a plan that ensures all Americans, regardless of where they live, have access to vital high-speed Internet services.

Respectfully submitted,

**AMERICAN CABLE ASSOCIATION**



By: \_\_\_\_\_

Matthew M. Polka  
President and Chief Executive Officer  
American Cable Association  
One Parkway Center  
Suite 212  
Pittsburgh, Pennsylvania 15220  
(412) 922-8300

Ross J. Lieberman  
Vice President of Government Affairs  
American Cable Association  
4103 W Street, N.W., Suite 202  
Washington, DC 20007  
(202) 494-5661

Christopher C. Cinnamon  
Bruce E. Beard  
Jeremy M. Kissel  
Heidi I. Schmid  
Cinnamon Mueller  
307 North Michigan Avenue  
Suite 1020  
Chicago, Illinois 60601  
(312) 372-3930

Attorneys for the American Cable  
Association

March 25, 2009