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# Broadband Alliance

*of Mendocino County*

**Date:** November 3, 2011

**To:** BAMC Steering Committee

**Subject:** Proposed Policy Positions

**From:** BAMC Intelligence and Advocacy Committee

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Recommendation:

The I&A Committee recommends BAMC adoption of the following policy positions:

**I. Universal Right to Service** – The Alliance supports the right of every person in Mendocino County to have affordable broadband access in their homes and businesses.

**II. Fund Broadband Deployment** – Market forces have proven inadequate to achieve general broadband deployment in Mendocino County. Additional funding is required. Grants must support a sufficient share of any project's total cost to make the project feasible for broadband providers and local matching funding sources.

**III. Require Accurate Deployment Data** – The Alliance has determined that federal and state data sources significantly overstate the degree of broadband deployment in Mendocino County. Correct information is necessary to ensure that broadband goals are met. Providers of broadband deployment data should be required to submit accurate data and such data should be verified through independent, in-the-field validation.

Background:

The Mendocino Board of Supervisors (BOS) is preparing its legislative agenda and BAMC has been asked by Supervisor Hamburg to provide input to that process. So, it seems an opportune time for BAMC to establish some high-level positions which would be useful to policy makers as they consider decisions which could impact our efforts.

In addition to the BOS, which has been supportive of BAMC and whom we should assist on broadband issues whenever feasible, other key entities with significant influence over broadband deployment in our county include:

- California Public Utilities Commission
- California State Legislature
- Federal Communications Commission
- United States Congress
- Private sector telecommunications and utility firms

The policies we have recommended could apply to decisions faced by any of these entities.

## Policy Position Discussion:

### **I. Universal Right to Service**

This position is consistent with BAMC's mission statement and national broadband policy. Its wording encompasses key concepts which can be used to assess legislative, regulatory and funding proposals, including:

- a) Casting access by county citizens to broadband as a right (it's not just a frill in the 21st Century)
- b) Stating that access must be affordable (perhaps measured as a share of average household income)
- c) Emphasizing that broadband must be extended to homes as well as businesses in Mendocino County

### **II. Fund Broadband Deployment**

In BAMC's comments to the FCC regarding the state of broadband in Mendocino County, we stated:

*"The FCC could assist by ensuring that grants provide a larger percentage of total project cost in order to incent providers, correct deployment maps at the gross and granular levels, and provide grant funding to all unserved rural areas regardless of income level."*

So, BAMC is already on record in a general sense regarding this policy position, and it is no surprise that the availability of funds is a major factor in whether broadband projects succeed. Grant match provisions which require a large percentage of non-grantor funding may create unreasonable barriers to deployment, particularly in light of the fact that the CPUC has dedicated approximately \$100 million to deployment through CASF and the FCC is dedicating billions of dollars through the new Connect America Fund.

### **III. Require Accurate Deployment Data**

BAMC's own research, which is corroborated by reports from other jurisdictions, indicates that major broadband providers tend to inflate deployment statistics, particularly in hard-to-serve areas. Since this misrepresentation can have the effect of reducing the urgency of deployment, incentives and sanctions to require accurate reporting appear to be necessary. Our county-wide deployment mapping project will likely prove to be a valuable resource to help hold providers accountable to the real state of broadband deployment in Mendocino County.