

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

In the Matter of)
)
Inquiry Concerning the Deployment of Advanced) GN Docket No. 11-121
Telecommunications Capability to All Americans)
in a Reasonable and Timely Fashion, and Possible)
Steps To Accelerate Such Deployment Pursuant to)
Section 706 of the Telecommunications Act of)
1996, as Amended by the Broadband Data)
Improvement Act)

EIGHTH BROADBAND PROGRESS NOTICE OF INQUIRY

Comments of the Broadband Alliance of Mendocino County
<http://mendocinobroadband.net>

September 6, 2011

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Introduction

The Broadband Alliance of Mendocino County (BAMC) submits the following comments in response to the Commission's Eighth Broadband Progress Notice of Inquiry, notice GN 11-121, released on August 5, 2011.

Mendocino County, California, is a largely rural, mountainous region located in the northern part of the state adjacent to the Pacific Ocean. The 2010 US Census reported a county population of 86,040 people, more than 50% of whom do not have access to broadband Internet service.¹

After years of effort by individuals and community-based organizations to bring high-speed Internet access to citizens of the county, the Broadband Alliance of Mendocino County was formed in August, 2010, to coordinate the disparate efforts and facilitate shared progress.

The mission of the Broadband Alliance of Mendocino County is to ensure that the county's population has affordable universal broadband access in their homes and businesses to support economic viability, ensure health and safety, and access educational opportunities.

The Alliance is an ad hoc committee of the Economic Development and Financing Corporation of Mendocino, established in conjunction with the Community Foundation of Mendocino County and the Mendocino Coast Broadband Alliance, and unanimously endorsed by the Mendocino County Board of Supervisors.

As a demonstration of its widespread support, BAMC gathered 71 letters of endorsement from businesses, public sector agencies, community organizations and individuals in July, 2011, supporting BAMC's affiliation with the Redwood Coast Connect Broadband Consortium.² In our capacity as the established voice of Mendocino County citizens on issues of high-speed Internet access, BAMC responds to the following questions posed by the FCC regarding broadband deployment in our county.

How Should Broadband Deployment Be Interpreted and Measured?

FCC broadband deployment data state that 84% percent of homes in Mendocino County have access to 4 Mbps downstream.³ This is grossly inaccurate. BAMC conducted an in-depth review of existing broadband infrastructure for our county's major providers (Comcast, AT&T and Verizon) and correlated that information with data actually collected from county residents. Our findings indicate that more than

¹ Attachment 1: Coverage Overview by Exchange

² Attachment 2: BAMC Endorsement List Summary

³ Source: www.broadband.gov

53% of the county population is either under-served or has no Internet access at all other than telephone dial-up service.⁴

The FCC broadband maps show cellular coverage throughout the county, which is not at all correct. In fact, cellular carriers in Mendocino County have only deployed 3G services to well less than half of the service area. The majority of Mendocino County's terrain has either no cellular coverage or legacy GSM/CDMA (144 kbps) coverage.⁵ BAMC members have manually verified this assertion by physically driving around our county to assess the degree of cell reception and the lack thereof.

According to the FCC broadband maps, Comcast cable serves the county with 100 Mbps to 1Gbps broadband service. However, those few communities within Mendocino County fortunate enough to have access to cable broadband service are not able to access more than 10 to 20 Mbps -- less than 20% of what is advertised.⁶

The topology of Mendocino county with its mountainous terrain, often heavily forested with tall redwood and fir trees, makes it physically impossible for many residents to have access to satellite Internet service. This fact is not demonstrated in the current broadband maps, and satellite service itself has been recognized as an insufficient solution due to its high cost, bandwidth limitations and service latency. Broadband communities need more options than just satellite service. We support comments to the FCC by the Mendocino Community Network regarding this issue.⁷

Since the FCC deployment information is so inaccurate, the FCC must dramatically improve its broadband deployment data collection and interpretation. One problem with FCC methodologies appears to be an overreliance upon carrier-provided data and a corresponding lack of independent validation of such information. In our opinion, carriers have a vested interest to overstate broadband deployment in hard-to-serve areas due to the reduced profitability of deploying in those areas and the carrier's opportunity to suppress competition. As an agency dedicated to serving the public interest, the FCC must ensure that the Commission's information is accurate enough to support sound policy-making.

Is Broadband Being Deployed to All Americans?

No. Mendocino County is just one of many regions in the United States where broadband is not being deployed in an adequate manner. FCC's own records corroborate this assertion. We commend the FCC for recognizing that nation-wide

⁴ Attachment 1: Coverage Overview by Exchange

⁵ Attachment 3: Mendocino County Broadband Deployment

⁶ Source: direct observation by BAMC members

⁷ MCN comment to FCC WC Docket 10-90, etc.; item F. Highest Cost Areas
<http://fjallfoss.fcc.gov/ecfs/document/view?id=7021704485>

broadband deployment is inadequate in your 6th and 7th inquiries into this issue, reversing previous flawed Commission findings to the contrary.

Is Broadband Deployment Reasonable and Timely?

No. Within our county, groups and individuals have been working for many years to accelerate and expand broadband deployment. Their efforts, which are typically undertaken by volunteers without meaningful funding, have achieved only rare and limited success, as demonstrated by the large percentage of unserved households in our region. The few State and Federal programs designed to enhance broadband deployment have largely passed by Mendocino County. This fact can be confirmed by a comparative examination of the broadband enhancement funding allocations made by these agencies. We are concerned that income restrictions on future grant programs may exclude many unserved rural areas in our county from eligibility.

Is Broadband Available to All Americans?

No. We recognize that some citizens may not choose to subscribe to broadband service, but in Mendocino County the majority of citizens do not even have the opportunity to make that choice. If broadband was deployed in our region, BAMC would never have had any reason to form. Our all-volunteer organization is comprised of busy professionals with many other priority tasks of concern. The only reason we are working so diligently to bring broadband to our county is because the lack of local broadband deployment is so apparent and so limiting.

What new data and/or analysis would improve FCC progress reports?

The FCC needs credible deployment data that is obtained independently of broadband carriers, perform in-the-field validation of that information, assess the needs of unserved and underserved communities and provide assistance, either directly or through related agencies, to those communities so local citizens can develop solutions that actually achieve broadband deployment.

What Actions Can Accelerate Deployment?

BAMC is undertaking a comprehensive broadband deployment mapping project for our region, we have identified numerous potential broadband deployment projects with locally-based project leaders, and we have affiliated with neighboring counties in regional consortia to leverage shared interests and resources. 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.

Attachment 1: Coverage Overview by Exchange

Exchange	DSL	Cable modem	Exchange	DSL	Cable modem
Boonville (895)	Yes	None	Pt Arena (882)	None	None
Cobb (928)	None	None	Potter Valley (743)	None	None
Elk (877)	None	None	Ukiah & Redwood Valley (462-8) (472-485)	DSL, ADSL2+	Comcast
Ft Bragg (961-4)	DSL	Comcast	Willits & Brooktrails (456-9)	DSL, ADSL2+	Comcast
Gualala (884)	None	Central Vly	<div style="border: 2px solid red; padding: 5px;"> Population of above areas: 40,779 <small>note: 2</small> Population of Mendocino County: 86,040 <small>note: 2</small> Percentage without access to broadband: 53% <small>note:3</small> </div>		
Laytonville (984)	DSL	None			
Hopland (744)	DSL	None			
Mendocino (937)	DSL	Comcast			
Covelo (983)	DSL	None			
Comptche (937)	DSL	None			

Note 1: Data is anecdotal, derived from vendor websites

Note 2: Source 2010 Census Bureau data

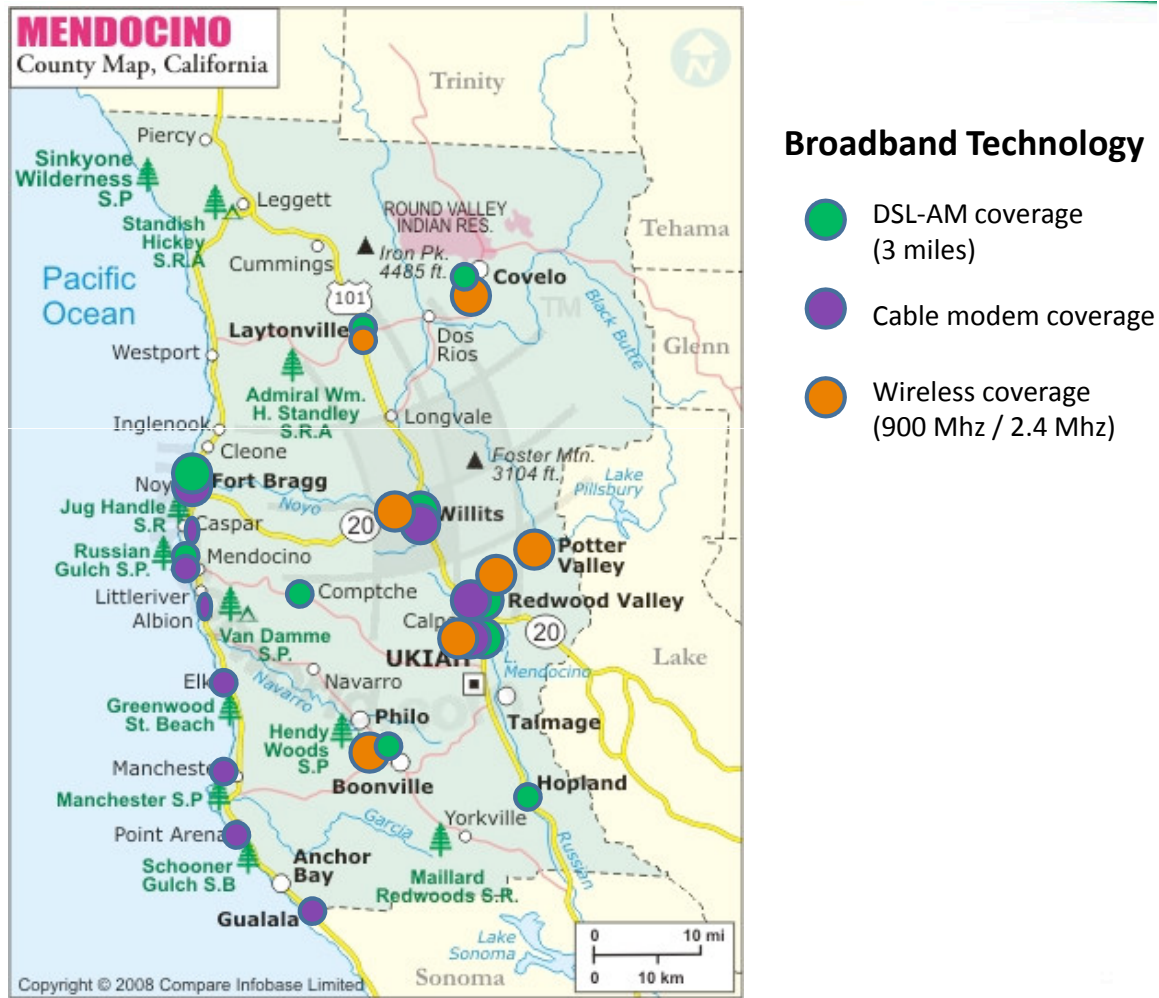
Note 3: Estimated; actual figure may be greater due to 3 mile limitation of DSL technology

Attachment 2: BAMC Endorsement List Summary

**CASF Broadband Consortia Endorsement List Summary
Mendocino County**

Category	County
Local and regional government	10
Public safety	5
Health care	3
K-12 education	2
Higher education	2
Libraries	2
Agricultural	2
Business	19
Parks and recreation	1
Tourism	4
Community-based organizations	5
Individual	16
Total	71

Attachment 3: Mendocino County Broadband Deployment



Note 1: Data is anecdotal, derived from vendor websites

Note 2: Dots indicate presence, not coverage area