



Economic Development Authority

*Serving Fayette, Nicholas, Raleigh and
Summers Counties in Southern West Virginia*

Michele Brooks, Acting Director
Program Development and Regulatory Analysis
USDA Rural Development
1400 Independence Avenue
STOP 1522, Room 5159
Washington, DC 20250-1522

RE: Proposed RUS Broadband Rule Changes

Dear Ms. Brooks:

This is written to express my concern regarding current proposals at the Department of Agriculture to refocus the RUS Broadband Loan Program. I believe that the proposed changes will actually harm the efforts of rural American communities as they try to compete for economic development projects which will improve their standard of living.

The purpose of the Broadband Program is to facilitate the development of 21st century infrastructure in rural America. As with other infrastructures notably water, sewer and power, rural America needs the active support of the federal government to develop advanced broadband infrastructure.

Our country is falling further and further behind the rest of the world in true broadband deployment. In a modern society, broadband is the most important line to a home, farm or business just as the highways, electric power and trains were to the last generation. The American citizens living in smaller communities deserve the benefits of affordable broadband as much as those in the larger cities.

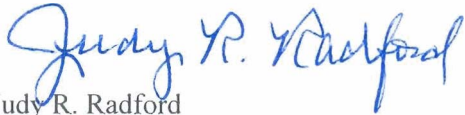
The current limitations on funding cities with populations larger than 20,000 disqualify the top five cities in West Virginia which is ranked as the 48th worst broadband and telecommunications state in the US. **A review of the 2000 Census data reveals that 53% of all West Virginia communities, less than 20,000 in population, will be ineligible under the new proposals. If more than ½ of all communities in West Virginia would be ineligible and the state ranks 48th worst in the country, it is obvious that the proposed restrictions just do not make sense for broadband deployment to rural America.**

From a rural community perspective we need to have affordable high quality broadband access to many service providers rather than just one or two large companies that control the pricing, services and access to services. Having worked over the past several years with the incumbents and new providers, it is clear that a viable broadband network in rural America will require low cost loans, guarantees and grants to attract and leverage commercial investment due to the scale and inherent business risks in communities less than 50,000 in population.

It is understandable that the incumbent cable and telecommunications companies would prefer for the RUS to not invest except in the smallest and most rural service areas, but the proposed rule change to limit eligibility to only those communities under 20,000 in population that the Census Bureau classifies as "Rural" is abandoning communities like ours to legacy network providers unable or unwilling to invest in new 21st century infrastructure as it is not in their commercial interests. The efforts to minimize potential competition to the incumbent service providers will likely result in perpetuation of the status quo, and rural America will continue to have sub-standard communications infrastructure.

I urge the RUS Broadband Program to reconsider the needs of rural communities as a priority over the pressure from incumbent lobbying to restrict investment in their service areas. We encourage the RUS to adopt rules which will enable such communities to enjoy the benefits of the Program, encourage the deployment of high quality low cost 21st century broadband infrastructure, and encourage real competition of broadband high speed access for rural America.

Sincerely,

A handwritten signature in blue ink that reads "Judy R. Radford". The signature is written in a cursive style with a large initial "J" and "R".

Judy R. Radford
Executive Director