



December 2, 2020

John Williams, Team Lead
Biden-Harris Transition Team on
The Federal Communications Commission
Washington, DC

Good Afternoon,

As the incoming administration considers new leadership and policy goals at the Federal Communications Commission (FCC) NRECA urges an evaluation of the recent Rural Digital Opportunity Fund (RDOF) Phase I broadband auction prior to distributing these vital funds to make sure the eligible unserved locations will receive reliable, high-speed, affordable, and future proof broadband that will meet the needs of today and for the next decade, or more.

The ongoing COVID-19 crisis has put the spotlight on the absolute and outright necessity for ubiquitous high-bandwidth broadband for all Americans, in particular the need for affordable services that provide robust upload speeds. This new and changing world depends on reliable two-way telecommunications capability. Unfortunately, many of the legacy internet services that rural Americans currently rely upon do not have the technological capability to provide sufficient upload bandwidth for reliable usage of the applications that are enabling remote access to critical services. The pandemic has forced us to rethink the practice and delivery of healthcare, education, and professional services, among many other things. And it has brought to light an all-too realistic picture of the negative impact on rural America caused by the lack of broadband access. Simply stated, people and businesses in rural America will struggle to emerge into a changed world that depends more and more each day on remote healthcare (telehealth), remote education (distance learning), and remote work (virtual offices) without significant investment into improved telecommunications infrastructure.

The Rural Digital Opportunity Fund (RDOF) is the Commission's biggest step to date in bridging the digital divide. The fund intends to distribute \$20.4 billion over ten years to bring high-speed fixed broadband service to rural homes and small businesses that lack it through two phases. The bulk of the funds, \$16 billion, are to be allocated in Phase I which has just wrapped up bidding. While we do not know the results of the auction, we believe it would be prudent of the incoming leadership to take a little bit of time to ensure the money is allocated appropriately and that unserved locations receive the best level of service for the money. For example, the CAF II auction resulted in about a quarter of all locations without a winning bid and in some areas received awards to deploy broadband at 10/1 Mbps, a speed that didn't even meet the FCC's minimum definition of broadband (25/3 Mbps). The FCC modified the rules from CAF II to prioritize higher-speed bids, but the agency should make sure its changes had the intended result. The RDOF will lock in federal broadband support for ten years. If mistakes are made those rural communities will be left behind in the digital divide for many more years.



NRECA looks forward to a more in-depth discussion with you once the results of Phase I are made public and can be analyzed. In addition, NRECA stands ready to work with the FCC and stakeholders to move forward with planning for phase II of the RDOF. Please don't hesitate to contact me if you have any questions.

Sincerely,

Jim Matheson
CEO, NRECA

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