

January 06, 2020

**Via ECFS**

Marlene J. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 - 12th Street, SW  
Washington, DC 20054

**Re: Accelerating Broadband Deployment, Broadband Deployment Advisory Committee (BDAC), GN Docket No. 17-83; Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment, WC Docket No. 17-84; Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment, WT Docket No. 17-79; Rural Digital Opportunity Fund, WC Docket No. 19-126; Connect America Fund, WC Docket No. 10-90**

Dear Ms. Dortch:

Please find attached an updated version of a White Paper prepared by NRECA entitled, “Broadband Deployment in Rural America Not Impeded by Pole Attachment Rates.” The updated White Paper includes data from a November 2019 Issue Brief by the U.S. Small Business Administration’s Office of Advocacy finding that the impediment to rural broadband deployment is low population density, and not pole attachment rates as claimed by some Tier 1 service providers. This fact has also been supported in analyses by the Virginia State Corporation Commission, a Virginia Hearing Examiner, the Tennessee Broadband Report, the U.S. GAO, the Congressional Research Service and recognized by the FCC’s own Intergovernmental Advisory Committee. All demonstrate that cost-based pole attachment rental rates have little, if any, influence on decisions by cable companies and other for-profit communications companies to invest in advanced broadband infrastructure in rural America.

NRECA also reiterates its opposition to the ill-considered proposal by CenturyLink and ITTA – The Voice of America’s Broadband Providers (“ITTA”) that electric cooperatives, and other entities expressly exempt from federal pole regulation by Congress, must comply with the Commission’s pole attachment regulations as a condition to participating in the Phase 1 auction of the Rural Digital Opportunity Fund (“RDOF”).<sup>1</sup> The proposed condition is not only improperly beyond the scope of this proceeding, but it also makes little regulatory sense.

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<sup>1</sup> See Comments of CenturyLink, WC Docket Nos. 19-126, 10-90 (filed Sep. 20, 2019) (CenturyLink Comments), at pp. 22-23; see also Comments of ITTA - The Voice of America’s Broadband Providers WC Docket Nos. 19-126, 10-90 (filed Sep. 20, 2019)

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Finally, NRECA reiterates its recommendation that the Commission establish performance tiers and bidding rules to ensure that bidders proposing the lowest weight, highest performance (and lowest latency) tier obtain funding to deploy and operate scalable, fiber-based networks capable of meeting the broadband service requirements within their authorized service areas for the full 10-year support term and beyond. Failure to properly prioritize highspeed networks well above the baseline tier (25/3) will result in "antiquated" networks at the end of the ten-year RDOF funding period.

Please contact the undersigned if you have any questions about this submission.

Sincerely,

*/s/ Brian M. O'Hara*

Senior Director Regulatory Issues – Telecom and Broadband  
NRECA

Enclosure

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(ITTA Comments), at p. 23.