



November 2, 2011

John Van Eschen
Manager, Telecommunications
Missouri Public Service Commission
P O Box 360
Jefferson City, MO 65102

Re: Case No. TW-2010-0362 (Feedback)

Dear Mr. Van Eschen:

Below are The Empire District Industries, Inc. comments to the email that was received on October 19, 2011 regarding feedback on the broadband development.

- A. Recommendations and potential public policy decisions on how to maximize broadband development in Missouri including increasing deployment and availability of broadband services.

The largest barrier to broadband availability is the business case to deliver services to rural or sparsely populated areas. The cost is prohibitive for the potential return from such few customers. The only way to encourage build-out in these areas is to subsidize or incentivize the potential providers.

- B. An identification of barriers to broadband deployment in unserved and underserved areas.

See A.

- C. Assessing advertised versus actual broadband speeds.

The internet is a dynamic, shared resource and it is difficult to perform a test and always match advertised speeds. A reasonable expectation would be to test several times and average the results. If it is significantly different there should be recourse. Also, if a service provides diminishing bandwidth depending on distance or the number of users, this should be advertised as well.

Respectfully,

*Tina Gaines
The Empire District Electric Company
Director of Engineeri*