



Missouri Telecommunications Industry Association

FILED

RICHARD TELTHORST, CAE
President

NOV - 3 2011

**Missouri Public
Service Commission**

November 3, 2011

Mr. Steven C. Reed
Secretary of the Commission
Missouri Public Service Commission
Post Office Box 360
Jefferson City, Missouri 65102

**RE: In the Matter of a Repository File in which to
Gather Information and Assess the Availability of
Broadband Services in the State of Missouri
Commission Case # TW-2010-0362**

Dear Mr. Reed:

Thank you for the opportunity to provide additional comments regarding the Commission's assessment of broadband availability in Missouri. In our July 21, 2010 filing, we made three broad recommendations for the Commission's consideration:

- 1.) Rely on the state broadband mapping project already underway to gather and assess data on current broadband deployment and the identification of unserved and underserved areas, rather than consume resources unnecessarily by undertaking duplicative efforts.
- 2.) Begin the discussion and analysis of policy recommendations, including solicitation of public and/or provider input, in 2011, given the wide-ranging policy debate on the National Broadband Plan now underway.
- 3.) Adopt a guiding principle that any considered or recommended policy choices are both technology and provider neutral, and focus on encouraging private investment and innovation.

From our perspective, these recommendations are still valid considerations. Over the intervening 15 months since our initial comments, there have been developments in each of these areas that should be noted.

As the Commission knows, the Office of Administration, in cooperation with the University of Missouri, is continuing to revise and refine the broadband availability maps begun in 2010 under the federal stimulus program. We have worked with the MoBroadbandNow office and their mapping sub-contractor to help ensure that these maps are as accurate and useful as possible.

We recently worked with the agency to urge that they take steps to improve the data as it is displayed on static maps posted on their web site regarding several rural areas of the state. They are in the process of refining these maps, and we encourage them to continue that work. The maps and the data displayed on them will be key topics for discussion at the 2011 Missouri Broadband Summit scheduled for November 17 in Jefferson City.

The Commission and staff are certainly well aware of the October 27 Order adopted by the Federal Communications Commission reforming both the Universal Service Fund (USF) and intercarrier compensation (ICC) regimes. As we highlighted in our earlier comments, these very significant federal policies will have wide-ranging impacts on all Missouri broadband providers and may well lead to numerous state policy revisions.

Given the tight timeframe remaining for staff to prepare the report, we would recommend that the FCC Order be summarized in sufficient detail to provide a general overview, and that a more detailed addendum be prepared and submitted to the Senate Commerce Committee in the first quarter of 2012. In particular, the Order's provisions transitioning the Universal Service Fund to the Connect America Fund and creating the CAF Mobility Fund need to be further analyzed in order to determine the specific impact on broadband deployment in Missouri.

In our earlier comments we noted the importance of encouraging private investment and innovation in order to spur broadband deployment. State policies, programs, and statutory changes that help build a strong business case for broadband investment can be very beneficial in this effort.

Government initiatives that increase broadband adoption, understanding, and demand can help stimulate the return on investment needed to further deploy networks. Policies that lower any existing barriers to investment, such as excessive right-of-way fees, local taxes, pole attachment charges and the like could also create a more positive climate for further broadband investment. We would encourage policy makers to work with broadband providers to identify and address these issues.

Again, thank you for consideration of our views. Please contact me if the association can be of further assistance in this effort.

Sincerely,

A handwritten signature in black ink, appearing to read "R. J. Telthorst", written in a cursive style.

Richard Telthorst, CAE
President