



To: Public Service Commission

From: Northwest Missouri Regional Technology Infrastructure Task Force

CC: Missouri Association of Councils of Government

Date: October 28, 2010

Re: TW-2010-0362 In the Matter of a Repository Docket in which to Gather Information and Assess the Availability of Broadband Services in the State of Missouri

Dear Commission Members

The Northwest Missouri Regional Technology Infrastructure Task Force (NWMO RTITF) is honored to have the opportunity to submit comments on "TW-2010-0362 In the Matter of a Repository Docket in which to Gather Information and Assess the Availability of Broadband Services in the State of Missouri". NWMO RTITF is part of the Heartland Foundation which is dedicated to ensuring that all Missourians have access to affordable high-speed broadband. Our group includes concerned citizens for all walks of life as well as experts in all types of communication technologies.

Please find below our comments regarding the "TW-2010-0362 In the Matter of a Repository Docket in which to Gather Information and Assess the Availability of Broadband Services in the State of Missouri".

1. Maximizing broadband development in Missouri.

**In the effort to reach the goal of "ubiquitous high-speed broadband for all Missourians," it is critical that the State of Missouri undertake an effort to determine the baseline capability and network infrastructure that exists today. It is our hope that this effort will provide Missouri with comprehensive and verifiable data meeting the NTIA Program standards; provide all data in an accessible and clearly presented manner without unduly compromising the data or protection of Confidential Information; create a workable and sustainable framework for repeated updating of this data; outline and implement a plan for collaboration with state-level agencies, local authorities, and other constituencies for broadband data collection and mapping; assemble a team with the capacity, knowledge and experience to complete the tasks; and create and hold to a realistic timeline for data delivery. Additionally this effort would ensure that we have an accurate and timely view of the infrastructure ensuring that Missouri maximizes our valuable resources. Without a clear picture of where high-speed broadband stands today, any construction or allocation of resources would not be in the best interest of Missourians.**

**In mapping the current infrastructure, we would encourage the use of an independent organization to create a statewide map of existing broadband infrastructure and recommend a plan for expansion**



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of the infrastructure. In addition, the organization would need to develop a method for ensuring that the maps are updated bi-annually to ensure we continue to build out infrastructure to meet the need of Missourians through the 21st century. The use of an independent agency is critical to the process of gathering data from the numerous Missouri providers and would address the protection of proprietary information.

Finally as the State begins to develop the baseline maps it will be crucial that every provider be required to provide detailed data on their technology foot print. It is worth noting that the data needed for the development of a statewide map is currently maintained by every provider due to FCC Regulation. Every provider now has to submit their coverage data to the FCC twice a year through Form 477. Leveraging the existing process would ensure standardization of data collected and reduce the need for dual reporting by the providers.

2. An identification of unserved and underserved areas in our state and the barriers to deployment in these areas including economic, geographic, regulatory, and market barriers. For purposes of this request, “unserved” shall mean an area where a consumer’s only access to internet service is through a dial-up connection and “underserved” shall mean an area where a consumer’s only access to high-speed internet service is at a speed less than three megabits per second.

We believe that each State needs to be on a level playing field when evaluating broadband availability. We are concerned that if Missouri uses criteria of unserved as dial-up only and underserved at 3 Mb or less, then others States may use higher service level criteria which could disadvantage Missouri from an economic development standpoint. Even the Federal Communications Commission (FCC) has modified the definition to 4 Mbps down and 1 Mbps down.

In producing previous Broadband Development Reports the FCC measured broadband by seeing what commercial networks were offering, what consumers were demanding, and "consumer applications and expectations". Specifically section 706 requires that broadband enable users to "originate and receive high-quality voice, data, graphics and video telecommunications". Even as we look at what the FCC is doing we know that current standard Internet applications in commerce, education and health care require significantly more than 4 Mb. And we also know that this demand is going to continue to grow rapidly and become a differentiator as communities work to attract new business, new jobs, and the right workforce. Thus, Missouri must carefully evaluate the level it sets to define "underserved" and "unserved". If we set our measurement levels too low our broadband availability number may appear artificially high, which may be especially harmful if we are competing for federal dollars.



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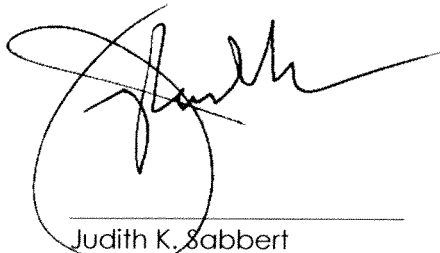
518 S. 6<sup>th</sup> Street – St. Joseph, MO 64501-9820 - p:816.271.7200 - tf:1.800.447.1083 - f:816.271.7269  
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3. Recommendations and potential public policy decisions that should be considered to increase the deployment and availability of broadband services in both unserved and underserved areas, within a period of five years at various speeds and rates that are affordable to Missouri's consumers.

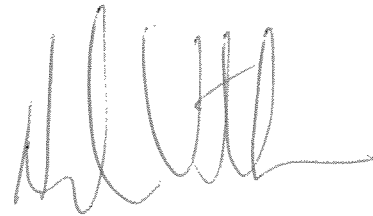
**Today the current stated public telecommunications policy objective in Missouri is "ubiquitous phone access for all Missourians". This is an objective consistent with early 20th Century life and needs, not 21st Century realities.**

**There must be a new public policy objective in Missouri to develop "ubiquitous high-speed broadband for all Missourians". This objective is in keeping with the spirit of the original objective but recognizes the technological shift that has greatly changed the needs of Missourians to communicate and do business in the 21st Century.**

Sincerely



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