

June 04, 2009

Commissioner Michael Copps
Federal Communications
Commission
445 12th Street, SW
Washington, DC 20554

Commissioner Jonathan Adelstein
Federal Communications
Commission
445 12th Street, SW
Washington, DC 20554

Commissioner Robert McDowell
Federal Communications
Commission
445 12th Street, SW
Washington, DC 20554

RE: GN Docket No. 09-51

The American Farm Bureau Federation (AFBF) appreciates the opportunity to comment on the Commission's development of a national broadband plan as required by the American Recovery and Reinvestment Act of 2009 (ARRA).

AFBF represents more than 6 million families who live and work in rural America. Many of our members and their neighbors are unable to access the same educational, medical, business and government services as Americans living in more populated areas. Access to modern, affordable broadband services has the potential to correct this inequity.

Therefore, we urge you to adopt the following recommendations, as sought by the Public Notice (GN Docket No. 09-51) released on April 8, 2009, when drafting our nation's broadband strategy.

The FCC should consider location when determining broadband availability. Many farmers and ranchers conduct their business operations from their homes and need to access to government resources and market information available on the internet. Therefore affordable home broadband access is especially important to keep American agriculture competitive in a world market place.

The FCC should consider price or marketplace competition in determining access to broadband services. Price and competition are key to affordability and the long term adoption of broadband services in rural America. In rural areas where broadband service is available, our members have reported that the service is beyond the financial means of many residents of their communities.

Broadband should be designated a "supported service" eligible to receive support directly from the Universal Service Fund (USF). The USF should be used to help with long-term deployment of broadband in rural areas. While the funds provided by the ARRA should help with the initial build out of rural broadband, on-going support will be needed to continue the build out, and maintain and improve the current infrastructure. Priority funding should be given to unserved areas of the nation. In order to promote competition and affordability in rural areas, multiple providers should have access to the USF. Where broadband service is currently available in rural areas, the lack of competing service providers often results in unaffordable service.

Broadband access in rural areas should be increased through any technology, including wireless. We encourage the FCC to eliminate disincentives that prevent the adoption of wireless services and to employ other mechanisms to encourage wireless broadband deployment in rural communities.

The ARRA requires the FCC to address how broadband access affects consumer welfare. To be economically viable, rural areas need access to health care, government services, educational and business opportunities. For many rural communities access can only be gained by using broadband services and sophisticated technologies that require high speed connections. America's farmers and ranchers need viable rural communities for the goods and services required for their agricultural operations. Rural business owners need access to new markets and supplies for their businesses. They all need affordable high speed broadband service to access markets, weather reports, and government agencies. The national broadband plan should take into account the contributions of American agriculture and rural businesses to our overall economy when evaluating the necessity of broadband access and service to rural communities the prioritizing the allocation of resources.

Thank you for the opportunity to comment on this important plan. The national broadband plan will have long lasting impact on the lives of America's farm and ranch families, their rural neighbors and future generations of rural Americans. We appreciate your commitment to rural communities and look forward to working with you in the future.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Maslyn". The signature is fluid and cursive, with the first name "Mark" being more prominent than the last name "Maslyn".

Mark Maslyn
Executive Director
Public Policy