

June 15, 2009

Roger C. Sherman
Chief Counsel
Communications and Technology Policy
Committee on Energy and Commerce
U.S. House of Representatives

Dear Mr. Sherman,

I am writing to share my concern with what is commonly understood to be the \$350 million dollar broadband mapping program, that is all but assured to be awarded Connected Nation, and share this perspective as the President and CEO of RidgeviewTel, a company that has been delivering broadband services to rural communities in multiple states for five years and has also been mapping both broadband "availability" and customer demand during that time.

It is RidgeviewTel's feeling that Connected Nation's approach and product is severely flawed, and we would like to add our voices to the chorus of concern being broached by a wide variety of individuals and associations, including the state of Kentucky where Connected Nation started. There are many others who are speaking up and attempting to get Congress' attention on this matter.

Please allow me to address the flaws first and then suggest a better way.

Some initial questions: As I understand it, the definition of "broadband" is still being debated on Capital Hill and at the FCC. That being the case, *how can anyone map WHERE something is when WHAT that something is has yet to be defined?* Also, *will the definition of broadband merely take into account the speeds a network must support to be considered broadband or will it also take into account affordability and availability? Is "broadband" that end customers cannot afford or cannot get access to really broadband?*

Connected Nation's approach is merely an effort to display to the country where fiber, copper and wireless broadband assets are located. RidgeviewTel (among others) can demonstrate that functionality today as well. However, in addition, we not only map where these types of assets are deployed, but also where the **citizens** are in these same areas who confirm they have no broadband access! Without real-time input from the citizens who live in the areas where Connected Nation or anyone else is stating that broadband is available, the data presented is unverifiable and less than useful for determining where broadband coverage is needed.

Additionally, Connected Nation does not take into account the capacity remaining on the broadband assets it maps. If the "available" DSL or wireless is saturated, then for the purposes of the citizens in the area, there is no available broadband.

Another flaw to consider is static vs. dynamic mapping. Connected Nation's maps are static and there is no easy way for existing and new carriers to update the information presented on the Connected Nation website to show additional and new availability. The result is that Connected Nation's information is outdated before the maps are ever published.

Finally, without broadband pricing information included in the coverage information, we don't know if broadband is truly affordable. If the cost of getting broadband is one or two mortgage payments, as it often is in rural areas, then the number of citizens who can take advantage of the broadband is very small. RidgeviewTel has seen this over and over as we have traveled and deployed networks around the country. According to Connected Nation's map, broadband is available when the assets are present - whether or not anyone can afford to use it is immaterial.

RidgeviewTel proposes accomplishing the nationwide mapping in 3 steps:

1. Start with a National Demand Aggregation program, such as We Need Broadband. This is the combination of a website and 800# service to serve both those on dial-up and those with no online options.
 - > Involve the state Economic Development Councils to help in the process of gathering citizen's location information. RidgeviewTel has experience with this collaboration and it works.
 - > Spend a portion of the \$350million allocated for broadband mapping to run a nationwide TV, Radio and Print campaign to educate citizens about the program and how the government and carriers are partnering, and what the location information will be used to do. RidgeviewTel can demonstrate the viability of this and capability to do this *today*.
2. Collect additional address information from various sources such as e911 databases, the US postal service and any other government and private sources that are available. Place these addresses in a common database and plot them on a nationwide map. This is important to the government and the carriers so that both can get an accurate household count of where broadband coverage is and is not. Again, this can be done, *today*.
3. Work with carriers to get their network assets and coverage areas plotted in a GIS / database system. The difference here with the Connected Nation map is that this is a dynamic, not static, plotting of assets and coverage areas, which can be updated by the carrier as their coverage changes. Actual coverage can be adjusted as frequently as needed based on service provider and citizen input via a website or 800#. Service providers would have access to their own network coverage maps and will be able to adjust them in real-time. This capability can be demonstrated *today*.

Why would the carriers do this?

The participating carriers will have access to the contact information of the citizens seeking broadband by contributing and updating coverage information. Also, by keeping their coverage information updated, the citizens who have participated in the program can see what carriers now provide service in their area. If an email address is provided, the system would automatically notify the citizen that broadband is now available to them and by which service provider(s). Think of it like a big broadband dating service. Carriers are looking for customers and customers are looking for carriers. This program and platform brings them together and also helps keep costs competitive, giving them *affordable* broadband.

Everything outlined here can be achieved *today*. RidgeviewTel will submit a proposal to run this program nationwide for considerably less than half the proposed \$350million. The remaining allocation can be used for the TV, Radio and Print campaign and better yet, to help fund the broadband deployment in the areas that need it. However, if the government is already committed to giving the money to Connected Nation, please consider carving out a small portion to a company that will actually get the job done.

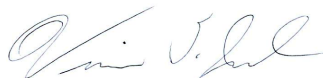
In the FierceTelecom article by Dan O'Shea on June 3, 2009 regarding the controversy surrounding Connected Nation, Dan asks,

The controversy was expected, but alternatives appear to be elusive. As stimulus award deadlines get closer, does anyone have a better idea for how the government should obtain accurate U.S. broadband maps?

The answer is YES. RidgeviewTel has a better idea and is ready, *today*.

Thank you Mr. Sherman for your time and consideration. We hope you will help us elevate this dialog and convince the committees to do more due diligence on what the country could have before awarding this grant to Connected Nation.

Best regards,



Vince Jordan
President/CEO
RidgeviewTel, LLC