

October 3, 2019

Mr. Ed Toner, Chair
Nebraska Rural Broadband Task Force
c/o Nebraska Information Technology Commission
Officer of the Chief Information Office
501 South 14th Street, 4th Floor
P.O. Box 95045
Lincoln, NE 68509-5054

Re: Nebraska Rural Broadband Task Force Findings and Recommendations, Task Force Subcommittee Reports

Dear Chairman Toner:

On behalf of the 61,000 Nebraska Farm Bureau (NEFB) families across the state of Nebraska, thanks to you and members of the Nebraska Rural Broadband Task Force (Task Force) for your efforts to address the challenge of bringing affordable and reliable broadband to rural Nebraska.

Every year, the Nebraska Farm Bureau Board of Directors sets the organization's policy priorities, and for the last several, expanding access to high quality broadband service across the state has been among the top.

Given the importance of rural broadband deployment to NEFB and our members, we would submit for your consideration the following comments in response to the Task Force findings and recommendations, as well as the Task Force Subcommittee reports.

Speed and reliability: The Task Force defined "unserved" areas as areas with internet service at less than 10 Mbps down/1 Mbps up, while underserved areas are areas which have internet service at 10 Mbps down/1 Mbps up or greater but less than 25 Mbps down/3 Mbps up.

While we understand the need to prioritize funding, given that the Federal Communications Commission has updated the definition of broadband to mean a minimum of 25 Mbps download and 3 Mbps upload speed, NEFB believes Internet Service Providers should be required to provide the basic definition of "broadband" (25/3mbps) to receive taxpayer support or to be shielded from subsidized competition.

According to USDA¹, while slow speeds are better than nothing, many next generation precision agriculture tools will require a more reliable and high-speed Internet connection as a minimum requirement. We hope elected officials and regulators recognize that when it comes to the amount of data collected and the speed at which our farmers, ranchers, and other businesses need to receive and transmit information, outdated, slow, unreliable service is almost like no service at all.

¹ <https://www.usda.gov/sites/default/files/documents/case-for-rural-broadband.pdf>

Types of Technology: The NUSF Subcommittee in its findings and recommendations concluded that, “total remittance to the NUSF have decreased and, while the PSC, has taken steps to stabilize the fund, the size of the fund is not sufficient to provide support for fiber deployment to all Nebraska residences and businesses.”

NEFB submits that, while fiber deployment has been the gold standard in speed and reliability, given the remoteness of most high-cost areas and the diversity of location needs (e.g. residential vs. a farm or ranch operation), fiber might not be the most efficient and affordable way for rural residents to receive high-speed internet service. We believe broadband deployment solutions are evolving rapidly and the Task Force, the Legislature, and the Public Service Commission should strive to be receptive and technology neutral to address the cost and logistical problems facing rural broadband deployment in the most cost-effective ways.

USF funds: We do appreciate the Task Force Subcommittee’s approval of the PSC’s grant-like, project-specific funding methodology. We believe, along with a requirement to report regularly on progress and meet date-specific milestones, this approach lends itself to more accountability and effectiveness than open-ended or automatic fund distribution.

We also appreciate and support the focus on public-private partnerships and encourage collaboration between carriers, local businesses, including farms, ranches, and cooperatives, as well as schools, municipalities, counties, and public power providers.

Broadband Cooperatives: NEFB very much appreciates the inclusion of the cooperative model in terms of entities which could play a role in advancing the deployment of broadband. In addition to utilizing existing marketing and service cooperative infrastructure, we believe there could be interest among Farm Bureau members and other rural residents in establishing cooperatives for the sole purpose of deploying broadband. We will continue to pursue and encourage more collaboration between government entities, the Nebraska Cooperative Development Center, and other interested stakeholders.

Disaster Recovery: Nebraska Farm Bureau believes NUSF dollars should be provided to telecommunications companies who have exposed and damaged infrastructure due to severe weather events or other natural disasters, only if telecommunications companies utilize the dollars to replace the infrastructure with technology which delivers 25/3mbps service. We understand the need to deliver service quickly following these events, but we also see clear pitfalls in offering assistance to replace outdated infrastructure with more outdated infrastructure.

Federal and State efforts: NEFB appreciates the Task Force’s emphasis on the need for more accurate data to ensure more accurate mapping. Whether its mobile or fixed broadband, FCC maps are significant, in part because they are used to determine where tax dollars should be targeted to deploy broadband. We appreciate the FCC initiating a rule change which will require fixed ISPs to provide geospatial maps of where they offer service and are hopeful the FCC will follow suit with mobile providers. We would ask the Task Force to consider these changes and what they mean to states especially those like ours who have a state-level Universal Service Fund.

¹ <https://www.usda.gov/sites/default/files/documents/case-for-rural-broadband.pdf>

NEFB has asked the FCC to wait for completion of its new mapping initiative before distributing funds, given existing maps are based on unreliable data, and we would ask the NPSC to do the same. Primarily, we want to ensure the efforts of our Task Force, our State Legislature, and our Public Service Commission coincide with and complement what's happening at the federal level, especially with limited tax dollars to go around.

Agriculture Subcommittee: Finally, we applaud the Task Force's recent formation of a Subcommittee on Funding and would ask you to consider establishing a Subcommittee on Agriculture. Rural broadband deployment is crucial to the agricultural industry and ultimately the economic wellbeing of our State.

NEFB appreciates our representation on the Task Force as well as the opportunity to weigh in throughout this process. Thank you again for your work; we look forward to ongoing discussion.

Sincerely,

Steve Nelson, President
Nebraska Farm Bureau Federation

¹ <https://www.usda.gov/sites/default/files/documents/case-for-rural-broadband.pdf>