

**STATEMENT OF  
COMMISSIONER JESSICA ROSENWORCEL,  
APPROVING IN PART, DISSENTING IN PART**

Re: *Rural Digital Opportunity Fund, Connect America Fund*, WC Docket Nos. 19-126, 10-90, Notice of Proposed Rulemaking (August 1, 2019)

I believe the future belongs to the connected. No matter who you are or where you live, you need modern communications to have a fair shot at 21<sup>st</sup> century success.

I also believe that if you want to understand the infrastructure of the future—and how to build communications that will connect us all—you need to start by looking back. So I want to discuss the effort a century ago to bring another technological innovation to light—namely, electricity.

The 1920's roared for city dwellers in the United States. Automobiles, telephones, movies, and radio crept into the culture, changing so much of our civic and commercial life. But while our urban corridors benefited from these innovations, rural communities were often left in the dark. In fact, during this period while 90 percent of urban residents had access to power, only 10 percent in rural areas did. This was the electricity divide. And it was a persistent problem. Power companies insisted it was just too expensive to electrify rural areas. The math was hard. The odds at profit long. Sound familiar?

So policymakers in the United States in the 1930's decided that instead of waiting for this divide to fix itself, they would do something about it. They pushed energy infrastructure out to rural areas in the Rural Electrification Act.

This history is powerful. It is a reminder that we can help build infrastructure with the right policies in place. We can solve problems and do audacious things with the right policies in place. We can bring more opportunity to more places across the country with the right policies in place.

The United States saw this clearly with electricity. So following passage of the Rural Electrification Act, policymakers got to work. They started with maps. Rural electrification authorities set out across the countryside to start their effort by mapping where service was and was not. Those maps still exist today. They are frayed historical documents. But they are evidence that real work was done to identify the location of electric systems, transmission facilities, and farms with and without electricity. In other words, these maps helped ensure that the nation's policies were properly targeted to the areas that needed them most.

I think this history is instructive. Because what we need now is a Rural Digitization Act patterned on the success of the Rural Electrification Act. The parallels are real. Today's digital divide looks a lot like last century's electricity divide. You see it clearly in the limited presence of digital infrastructure in rural areas, the hard economics of deployment, and the lack of opportunities that result.

I think this framework—and the idea of a Rural Digitization Act—should inform our next big effort to expand broadband. So I think we should take our cues from the work to expand electricity. Just like we did nearly a century ago, we need to begin with where infrastructure is and is not. We need to start with data. We need to develop maps.

Of course, right now the Federal Communications Commission has broadband maps from operators. That's good for starters. But we need to do a whole lot better. Our maps need to be more granular. Then, they need to be verified. I want us to test what we have here in Washington with spot checks in the field, challenges from local authorities, and data from consumer crowdsourcing. This mapping effort is not going to be simple, but it's vitally important. It's where we need to begin if we want to understand the state of deployment and ensure digital infrastructure reaches everyone, everywhere. After all, we will never manage what we do not measure.

This is why today's rulemaking is so important. But there's something fundamentally wrong here. We do not start with maps. We do not start with data. In fact, take a look at the draft rulemaking before us and it barely mentions the fact that we have a separate proceeding we are voting on today involving maps.

In fact, this rulemaking rushes past that effort and simply proposes a successor to our existing Connected America Fund, distributing \$16 billion dollars before *any* new data comes before this agency. Before *any* new maps are developed. I understand the impulse to move fast. I know that we should be working at warp speed to get modern communications to too many places that have waited too long for digital opportunity. So let's do it. But let's commit to doing it right.

This is putting the cart before the horse. Even carriers that might be beneficiaries of these funds have urged us to get the mapping right first. After all, the decisions we make now will direct funds for broadband for the next decade. So choosing where those funds go for the next ten years without having accurate data is a real problem.

It's also a shame that as we plan for the next decade our goals are so modest. We should be aiming high, with broadband speeds faster than today's standard of 25 megabits per second. If you look back ten years, you'll find that the FCC's broadband standard was 200 kilobits per second. That is comically slow today. But with this proposal we're taking today's standard and assuming it makes sense ten years hence. That's not right.

Thinking small didn't deliver the Rural Electrification Act and light up the countryside. It's time to think bigger and bolder. It's time to do so informed by good data.

I support this rulemaking in principle. But the proposal here misses the mark. We need to take a cue from our success in the past and address rural digitization like we did rural electrification. We need maps before money. We need data before deployment. I approve in part and dissent in part.