

**STATEMENT OF
COMMISSIONER GEOFFREY STARKS
APPROVING IN PART, DISSENTING IN PART**

Re: *Competitive Bidding Procedures and Certain Program Requirements for the Rural Digital Opportunity Fund Auction (Auction 904)*, AU Docket No. 20-24; WC Docket No. 19-126; WC Docket No. 10-90.

When we voted on the Rural Digital Opportunity Fund last month, I raised a number of concerns. Two of the most important were (1) that we are continuing to distribute funds based on deeply flawed Form 477 data and (2) that we have adopted a confusing and counterproductive approach toward coordinating RDOF with state funds. I won't repeat those concerns here, but I want to underscore that we do not have to let those problems stand. We have options. Nearly two dozen members of Congress have asked us to give states an opportunity to comment on the portions of our January decision that impact state programs and then reconsider that decision. And, just yesterday, Senator Manchin of West Virginia sent a letter urging us to "revise the aggressive timeline" for RDOF "until after the eligibility maps can be challenged and verified." I believe that fiscal responsibility, prudence, and the law all require us to heed those calls. Getting this right is critical. Over the last year, I have met with individuals in communities around the country who need better broadband, including at a recent congressional roundtable in Virginia and a field hearing in New York—two states with their own broadband initiatives that are in the process of understanding how RDOF will impact them. We owe it to those communities to be good stewards of universal service funds. For that reason, while I approve of the auction mechanism the FCC adopts today, I cannot support pressing ahead toward an artificial deadline with such significant concerns unresolved. For that reason, I dissent with respect to the remainder of the item, including the auction timeline.