

**REMARKS OF
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NTCA—THE RURAL BROADBAND ASSOCIATION
LEGISLATIVE AND POLICY CONFERENCE
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Good morning and thank you Shirley for that welcome. I send my best to everyone and their families, particularly those who have lost loved ones due to this unprecedented pandemic. In just a few short weeks, COVID-19 dramatically changed the way we live. To date, more than [776,000 Americans have tested positive for the virus, and approximately 37,000 have died](#). In the last few weeks, more than 22 million Americans have filed for unemployment which puts the unemployment rate at just [over 20 percent](#). The rapid spread of this virus has, of course, changed the daily structure of our lives. Over 45 million K-12 schoolchildren have been sent home where millions are now participating in distance learning while many others have been forced to put school on pause while they care for younger siblings and help tend to their households. And we have millions of Americans teleworking and trying to adjust to the new normal of participating in video conferencing while caring for their children. And for many who may want to take solace in religious services, their homes have become their places of worship.

COVID-19 has significantly altered our economy, our schools and even our churches, but our communities are still surviving and finding creative solutions to meet these challenges, even under these unique circumstances. Health care workers and first responders are working around the clock, and essential workers like grocery store clerks and delivery personnel are putting themselves in harm's way to help keep their neighbors safe and at home.

I have called for the FCC to enact a "connectivity stimulus" to see Americans through the coronavirus crisis and power our economy. Our longstanding digital divide has morphed into a monstrous new COVID-19 divide, and we must act NOW to connect our communities who are struggling to stay afloat during this crisis. This pandemic may define our generation, and the changes in our daily lives required by social distancing have highlighted the importance of broadband and the consequences of internet inequality.

Across America, we're relying on broadband to help us perform our work duties, educate our children and participate in telehealth visits. But for millions of people in this country without a broadband connection at home, it's a different story. Those who are unconnected cannot work from home or access critical public health information. Their children are missing critical virtual instruction. And a persistent cough now requires these folks to choose between whether it's better to "tough it out" or risk venturing to the doctor's office because they lack access to a broadband connection that will provide them with telehealth services.

NTCA members and other broadband providers are stepping up. Hundreds of companies have signed the Keep Americans Connected Pledge. But the work hasn't stopped there. NTCA members like Bulloch Telephone Coop in Statesboro, Georgia, Totah Communications in Ochelata, Oklahoma, and Federated Telephone Cooperative in Chokio, Minnesota have created Wi-Fi zones in their communities to provide internet access to people who can't connect at home. Other members are extending free service to the disconnected and offering free upgrades. I appreciate and salute these initiatives.

While our current circumstances may be novel, the problem of internet inequality certainly isn't. No broadband connection at home means less access to healthcare, education, and government services. That's why the FCC's Universal Service Fund programs are so important. We know that millions of Americans in the hardest to serve areas are getting left behind. I'd like to discuss four points that I think are necessary to address the digital divide in rural America.

First, the FCC must fund rural broadband with fixed maps. Good policy requires good data. I continue to sound the alarm on this issue and I recently voiced my concerns about the FCC's \$20.4 billion dollars for the 10-year Rural Digital Opportunity Fund, also known as RDOF. I have zero tolerance for continuing to spend precious universal service funds based on bad data. There is bipartisan—and nearly universal—agreement that our existing broadband deployment data contain fundamental flaws.

We know—from the tireless work of researchers, state agencies, and community activists—that our failure to get broadband mapping right has had serious consequences. Members of both chambers of Congress have repeatedly admonished the Commission to fix its data. More importantly, I've talked to the Mayor of Dahlonega, a small city in Lumpkin County, Georgia, who has the same question as people in rural, Hudson, New York: why do your maps say that we have broadband when we don't? I can't explain it, other to say that we at the FCC have got to do better.

Second, to address rural connectivity we must incentivize providers to bring future-proof broadband to our communities. The Commission has a responsibility to ensure that its policies to promote broadband deployment are working, and our USF program is an important example of where we must do better. A close review of the RDOF decision finds that many communities that will be deemed eligible as "unserved" previously received federal dollars as recently as five years ago through our high cost program known as Connect America Phase I. It is shocking that we need to re-deploy USF funding to get better broadband to these communities, and crystallized for me that we must better understand how our rural telecom support programs have performed historically so that we can better future-proof the broadband we purchase through the RDOF over the next 10 years.

Sometimes you have to look back to move forward. That's why I've consistently called for the FCC to conduct a data-driven 10-year look-back on how our high cost programming has performed in bringing broadband to our hardest to reach areas. Where have we succeeded? Where did we miss the mark? Which communities have had their connectivity needs met by the program in the way that we expected? Which haven't, and why? We MUST understand why. Here is the point: we can't afford to wake up 10 years from now with another \$20 billion spent, and yet still fail to understand with precision which communities remain unserved and how we can accurately finish the job.

Third, we must hold auction winners accountable. The FCC will disburse nearly \$1.5 billion dollars in support over the next 10 years through its Connect America Fund II program. Checks are being issued to auction winners and the stakes are high for the communities that lack high-quality broadband. But I've met with communities that are anxious about whether the service they've been promised under CAF-II will actually come to pass. Unfortunately, more than a dozen CAF-II auction winners have already defaulted on their bids to provide service to rural areas in states like Arkansas, Minnesota, Michigan, Nevada, Nebraska, Colorado, Missouri,

Oklahoma, Kansas, Massachusetts, and Virginia. The high stakes are clear as communities receiving support under CAF-II will not be eligible to do so under RDOF.

Fourth, and a topic that I want to spend some time on, as it has been on my mind a tremendous amount these days, is that to fully address rural broadband we must advance a more affordable way for our poorest Americans in rural areas to connect to the internet. Quite simply, the FCC should require USF auction winners to offer an affordable broadband service option. The average family in America spends \$2,700 per year on their internet, phone and cable. For many working families dealing with increasing expenses and nearly flat incomes, that's just too much. These were the expenses prior to the economic fallout of the COVID-19 pandemic and many families face even more financial constraints now. Let me put the research another way, based on Pew data and the American Community Survey, researcher John Horrigan estimates that more than 18 million households lack broadband because it's too expensive. Again – pre-COVID-19 figures. For families struggling to make other payments like rent and groceries, the cost of home broadband looks like a necessity they just can't afford.

Currently, we know that a number of ISPs provide low-cost internet offerings around \$15 or less with varying qualifying conditions: to persons on another low-income subsidy (such as SNAP, Medicaid); to families participating in federal school lunch and other programs; and to seniors and veterans. While I would like to see these conditions waived during the emergency pandemic, these low-income programs provide a good start for us to examine what an affordable offering may look like. With the increasingly essential nature of broadband service, all Americans should have access to affordable broadband. The point is clear: in times of emergency, no American should go without a broadband connection because of cost.

I would be remiss not to spend at least a minute or so on a program that I think is critical right now. As we address one of the worst health and economic crises in our nation's history, the FCC needs to reexamine our policy towards Lifeline, the only federal program with the sole mission of bringing affordable communications to low-income Americans and a critical aspect of our social safety net. The Commission should be working to strengthen and extend the reach of this program, like the George W. Bush-era FCC did in response to Hurricane Katrina.

To start, the program is woefully undersubscribed, with only about 7 million households enrolled—that's less than a quarter of the roughly 38 million households that are eligible for the program. The Commission must take the helm in informing eligible Americans about the Lifeline program, including by better targeted advertising and more importantly, entering into MOUs with other federal agencies, including USDA (Supplemental Nutrition Assistance Program), HHS (Medicaid), SSA (Supplemental Security Income), VA (Veterans Pension and Survivors Benefit Programs), and HUD (Federal Public Housing Assistance). Those agencies all administer services that determine eligibility for Lifeline. That is to say, if you newly enroll in a qualifying program for our social safety net, like SNAP, you qualify for Lifeline. There are natural synergies here that we must take advantage of, similar to the motor-voter program where you offer the opportunity to get registered to vote when you apply for a driver's license. One way or another, these new enrollees must immediately learn about the Lifeline program and how to sign up for it. Americans literally can't afford for our government to work in silos right now.

I have concerns that we have had and will continue to have people making sacrifices in other parts of their lives because they are paying for voice and broadband services when they

could be receiving this much needed subsidy. Additionally, I'm hearing directly from Lifeline subscribers who are sounding the alarm that 1000 minutes and 3 GBs of data is simply not enough when social distancing. These subscribers have discussed how staying at home means they are spending more time on the phone and searching for resources online. We've already seen providers step up and increase their voice and data offerings; however, the Commission needs to view this as an emergency and step up ourselves to ensure that more is done to help our most vulnerable communities.

This pandemic has shown us that we could have been doing more to address internet inequality but as we look at our past actions, we must see this as a new opportunity to connect those who have been left behind. And more importantly, we must rise to the occasion to ensure that every American can afford to connect to the necessity that is broadband. Thank you for having me today and stay safe and healthy, everyone.