

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

Re: *Rural Digital Opportunity Fund*, WC Docket No. 19-126; *Connect America Fund*, WC Docket No. 10-90.

Internet inequality in the US is deepening. We see it across rural and Tribal America and in cities that have either been left behind from fast broadband deployments or cities that are left to make do with speeds and technologies that are too slow and are long obsolete. And, in most cases, service providers have already built broadband everywhere where it makes business sense to them to do so, and there are often no plans for upgrades on the horizon. The vitality and very existence of communities is threatened when there are no affordable, quality broadband connections available. Students are unable to use the digital tools that are bringing the world into the classroom for most of their peers. Patients are unable to take advantage of new developments in telehealth and must continue to drive, often for hours, to distant urban centers for medical treatment. And, young residents are increasingly leaving these rural communities, taking with them all that the communities have invested in them.

The common factor that is missing in these communities is quality broadband infrastructure. Making sure that everyone in the US has access to quality affordable broadband is my highest priority and is our most important job at the Commission. The Universal Service Fund is our best tool to deliver quality broadband to all. Universal Service dollars are both valuable and limited and we must use them wisely to get broadband out to where it is needed. It is certainly right to think about the future of the program, as today's NPRM does, and it is important to have a plan to ensure that USF continues, in the upcoming decade. But, I don't agree with some of the fundamental proposals in the NPRM before us.

Our experience with using USF to support broadband buildout has shown us that we have to understand, in detail, the problem we are trying to solve before we start spending money to solve it. If we don't, we run the risk of throwing money to the wind and hoping that it lands in places where it will help. Specifically, we have learned that in order to understand the problem we need to know where broadband service is and is not available in the United States.

However, as members of Congress, stakeholders, and thousands of people across the country have told us, the broadband data that we collect through the current Form 477 process and the maps that we create with it do not give us a clear understanding of where broadband is and is not deployed. I therefore find it surprising that the Commission proposes spending \$16 billion dollars - nearly 3/4 of the USF support the FCC intends to use over the upcoming decade - without any improvement to the data it will use and without any reliance on updated and improved maps to tell us where the money needs to go. I understand that the 477 data may, when it is filed accurately or when the Commission identifies and fixes errors it contains, be useful for identifying census blocks lacking fixed broadband service. But, the fact of the matter is, this is the same data set, from which the recent Barrier Free debacle, with its overstatement of service by more than 60 million lines, arose. Simply put, I'm not confident in this data and I'm not confident that it tells us where broadband is and is not deployed in the US. And as long as the Commission continues to use this data for policymaking, it's our responsibility to ensure that it is accurate and reliable as possible.

As with any policy making exercise, the proposed Rural Digital Opportunity Fund we are considering today appears to have involved making choices. Choices between how quickly to hold the next USF support auction, how much money to allocate in the auction, how long the support provided in the auction will last, and how confident the Commission is in the accuracy of the data underlying the auction. And, these choices are interrelated. The quicker the time to auction, the less time there is to ensure that the data is accurate. And, the higher the budget and the longer the term of support, the greater the consequences of having inaccuracies in the underlying data mistarget Universal Service dollars.

It appears to me that in making the Rural Digital Opportunity Fund proposal, the FCC is choosing speed to auction over accuracy. But, at the same time, this choice includes a huge budget – \$16 billion dollars – and a long term of service – 10 years. I don't think these choices strike the right balance. If speed to auction is the primary concern, and I certainly understand the urgency of getting support out to areas that need it the most, then the Commission could have chosen to proceed rapidly, but with a smaller initial budget and a shorter service term to get service out to areas that need it the most while bringing the Digital Opportunity Data Collection that we start today up to speed. And, when improved data and maps are ready, the Commission could then proceed with additional support for longer terms. But that is not the proposed approach.

Ultimately, I think that plans for the future of Universal Service need to start from a foundation of accurate data and maps and build from there. I am hopeful that the Digital Opportunity Data Collection that we are launching today will lead to such a foundation, but I have concerns about starting the next phase of the Commission's Universal Service Program, a phase that contemplates using \$16 billion dollars, without having better data and maps in place.

That said, I also recognize that that the Rural Digital Opportunity Fund proposal builds off of the success of the Commission's Connect America Fund support auction and that it contains many good ideas for continuing the Commission's work in this area. I look forward to reviewing the record and to working with my colleagues to plan for and shape the future of the Commission's Universal Service program. This is our greatest responsibility – the mission of eliminating internet inequality is too important, and the dollars are too precious to get it wrong.

I thank the staff of the Wireline Competition Bureau for their long-term commitment to ensuring that USF works to make high-quality broadband available throughout the US and I thank everyone involved for their work on this NPRM.