

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

Re: *The Rural Digital Opportunity Fund Auction (Auction 904); Rural Digital Opportunity Fund; Connect America Fund*, AU Docket No. 20-34; WC Docket Nos. 19-126, 10-90

There are fundamental flaws with the Rural Digital Opportunity Fund. Regrettably, this decision does not repair them. It only doubles down.

Over my objection, the Federal Communications Commission is slated to distribute \$16 billion in universal service funding a week before the upcoming election. This represents 80 percent of the broadband support available during the next ten years, tying the agency's hands for a decade. Moreover, the data behind this distribution suffers from well-known problems. The FCC's broadband maps have an error rate as high as two-in-five. So the decision to move forward like this now drains the FCC's broadband bank account before getting our facts straight about where service is and is not on the ground.

Proceeding this way is a mistake. But adding to the error is our decision refusing to work with states to help extend the reach of broadband. In this order on reconsideration, the FCC reaffirms its earlier decision to disqualify areas from the auction that are supported by state efforts and cut off state authorities interested in working with us. Specifically, it turns down requests from Vermont and Illinois to assist with disbursement expanding high-speed infrastructure in their states. To this end, it rejects the Vermont Department of Public Service's warning that the way the funds are flowing under the Rural Digital Opportunity Fund will have the opposite of their intended effect, slowing the dispersing of broadband dollars and resulting in "less broadband buildout in the state overall." Likewise, it rejects the efforts of the Illinois Office of Broadband to urge "a stronger federal-state partnership [to] help coordinate state and federal broadband investment in order to maximize efficiency and minimize duplication."

This is unfortunate. We should have explored these kind of partnerships with Vermont, Illinois, and states across the country. After all, they understand with greater precision than we do in Washington where service is and is not in their own backyard. In other words, we should be encouraging states to work with us and not penalizing them for their efforts to bring broadband to communities that are struggling. We have this exactly backwards. For this reason, I dissent.

At the risk of being technocratic, I want to note that in one limited respect I think this decision makes the right call. It chooses not to reach conclusions here about the second stage of the Rural Digital Opportunity Fund. This part of today's decision has my support.