

**STATEMENT OF  
COMMISSIONER JESSICA ROSENWORCEL  
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.

Last fall, I joined Senator Manchin in West Virginia. We crisscrossed the Mountain State at the peak of its autumn glory. The towns we stopped in were small, all proud of their history and all grappling with their future. Everyone we met expressed concern about how reliable broadband had not yet reached the homes and businesses in their community. They spoke of the connections they were not able to forge, the economic opportunities that had been lost, and the students who struggled with the homework gap. Their frustration was real. They were also aggrieved that this agency's maps say they have broadband when they know on the ground, at home and at work, they simply do not.

In the fall, I also traveled to upstate New York. Same story. People want to know how they will ever grow a business, sell their home, or see their community thrive when there is no broadband to be found. To add insult to injury, when these Empire State folks looked at Federal Communications Commission data they found something disturbing: this agency said they have service when they clearly do not.

A few weeks later, I ventured to southern New Mexico. I spent time with healthcare providers looking at how telemedicine could improve outcomes in vast rural stretches of the state. But for so many of their patients, broadband is a pipe dream. It's just not there. Again, I was told our maps do not do justice to the lack of service. One of the people I met asked a question that still stings: How will we really fix this problem without first fixing our maps?

That question deserves an honest answer. So here it is: Thirteen days before the election, the FCC will start the largest program for federal broadband funding in our nation's history. But this Rural Digital Opportunity Fund looks more like publicity stunt than policy. That's because we are spending billions of dollars without the facts we need. We have not done a single thing to fix our dubious broadband data or address our inaccurate broadband maps. Those are the maps that have been panned by Congress, cabinet secretaries, and consumers. They're not accurate. Worse, for everyone who our maps erroneously suggest is served by broadband when they are not, moving ahead here means it could be ten years before this agency is able to offer any further assistance. For too many people in too many places like the ones I visited in West Virginia, New York, and New Mexico that means our digital divide will turn into a yawning chasm.

This is not right.

*To do this right, we need maps before money and data before deployment.* It's time to work. We need to roll up our sleeves and get the data we do not have about where service is and is not. Then we need to do just what Senator Manchin said in a letter to all of us yesterday: hold this auction only after our maps can be fixed, challenged, and verified. Failure to do that will fail millions of people in communities that will never see support from this agency even though they are stuck on the wrong side of the digital divide.

*To do this right, we also need to acknowledge that we are not going to do it on our own.* We need to work with state and local authorities and not fight their efforts to help bring broadband to their communities. But that's not what we do here. In fact, last month in a batch of last-minute changes, the FCC decided that the Rural Digital Opportunity Fund would not be available in places where states have their own programs. By some counts, that's as many as 30 states. That's crazy and we have no idea how it will play out on the ground. We should be encouraging states to work with us not penalizing them for their efforts to bring broadband to communities that are struggling. We have this exactly backwards.

*To do this right we also need straightforward procedures to facilitate distribution of funds.* On this last point, let me acknowledge the hard work of our agency staff. Because this Public Notice asks the right questions about how to implement a descending clock auction. It's the lone aspect of this effort I find sensible. It's the only part that has my support.

Universal service is a cherished principle. Fixing the digital divide is at the heart of this agency's mission. But doing it in a haphazard way where we are distributing billions of dollars without taking care of job one—making sure we have the data to do so—is unacceptable. So in this regard, I dissent.