

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

Re: *Establishing a 5G Fund for Rural America*, GN Docket No. 20-32, WT Docket No. 10-208.

Access to broadband helps rural areas tap into economic and educational opportunities that may not be close to home, which encourages young people to stay and attracts new residents and employers. To promote those economic and social benefits, I strongly support the Notice of Proposed Rulemaking's goal of bringing state-of-the-art wireless service to all Americans, especially rural communities. I look forward to robust public feedback on the many important questions raised in the NPRM. I cannot, however, endorse the false choice between speed and accuracy it sets forth. Because I believe we can and should target this funding using the new coverage maps Congress has ordered us to develop, I must dissent in part.

Option A would distribute funding based on degrees of rurality, without finishing the corrected maps required by the Broadband DATA Act. Making funding decisions, particularly for such a long period, without accurate deployment data is bad policy for all the reasons I outlined with respect to the Rural Digital Opportunity Fund. In this case, it also creates a raft of practical problems. The NPRM proposes, for example, to prioritize areas historically lacking mobile service. How will we do that? The only option the NPRM considers is using Form 477 data that, as the NPRM acknowledges, does "not really reflect actual on-the-ground coverage in many instances." Relying again on bad coverage data would be an insult to the many state and local governments, organizations, and individuals who invested time and money in the failed Mobile Fund Phase II challenge process.

It would also knowingly avoid Congress's directive that we make funding decisions based on better data by stalling the critical effort to fix our maps. The NPRM asserts that Option A complies with the Broadband DATA Act because the Commission does not have to base funding decisions on new maps until there are new maps. Even if that satisfies the letter of the law, Option A boldly ignores the spirit of the law. And it looks to me like the Commission is sidestepping the statute by deprioritizing and dragging out the mapping process. When it comes to maps, we're waiting on ourselves.

The Broadband DATA Act requires the Commission to adopt final new mapping rules by September 2020 at the latest. The premise of Option A is that we cannot expect new maps to be complete even a year after that. If that is true, it is because the Commission has not prioritized this work. Chairman Pai announced the creation of the 5G Fund on December 4, 2019, nearly five months ago. Imagine how much closer to a well-targeted 5G Fund we would be if we had committed the necessary resources—on that day—to producing and finalizing accurate maps, full speed ahead. If you need a longer horizon, consider where we would be if we had fully committed to the effort in December 2018, when Chairman Pai announced the investigation into carriers submitting inaccurate coverage data.

We could have chosen to prioritize and invest the Commission's resources in getting the mapping project moving. We could have done this a better way. Instead, the Chairman has proposed another 10-year multibillion-dollar commitment that, when combined with RDOF, could mean that the vast majority of our high-cost support is spent chasing bad data *for another decade*. For these reasons, Option A should not even be up for consideration.