

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

Re: *Rural Digital Opportunity Fund Phase I Auction Scheduled for October 29, 2020; Notice and Filing Requirements for Auction 904, AU Docket No. 20-34; WC Docket Nos. 19-126, 10-90.*

Investments in bringing broadband to unserved areas are more critical than ever. As I have noted throughout the development of the Rural Digital Opportunity Fund (RDOF), I support the auction structure, but I remain concerned about some key features of the program. That includes our decision to spend such a large portion of the budget—over such a long term of support—based on broadband maps that are not accurate. I would have preferred to start with a smaller budget or shorter term of support so that the bulk of the RDOF funds could be spent after we complete the mapping overhaul that data-driven policymaking and the Broadband DATA Act require. Because this item builds on that flawed foundation, I must dissent in part.

The ten-year term the Commission chose in January has additional ramifications for this Public Notice. Committing so much of the budget for so long raises the stakes on how we treat emerging technologies and technical capabilities. I appreciate Commissioner O’Rielly’s work in revising this Public Notice to eliminate the categorical bar on low earth orbit satellite systems bidding in the low-latency tier, especially now that we have evidence in the record that those systems can meet the 100-millisecond latency standard. At the same time, I see no need for the Public Notice’s predictive judgments about the merits of short-form applications from low earth orbit satellite operators. As I have stated previously, next-generation satellite broadband holds tremendous technological promise for addressing the digital divide and is led by strong American companies with a lengthy record of success. Commission staff should evaluate those applications on their own merits.

My reservations about certain aspects of the RDOF program have not changed. Nevertheless, I recognize and appreciate the hard work of staff in the Wireline Competition Bureau, the Office of Economics and Analytics, and the Rural Broadband Auctions Task Force.