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Subject: Broadband Opportunity Council RFC: Expanding Broadband
Date: Wednesday, June 10, 2015 4:10:09 PM

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RE: Request For Comments: *Expanding Broadband Deployment and Adoption by Addressing Regulatory Barriers and Encouraging Investment and Training.*

Response to Broadband Opportunity Council Request For Comments

HOULTON, ME (June 10, 2015) - Pioneer Broadband, a Maine telecommunications provider, is pleased to respond to the RFC issued by Broadband Opportunity Council Notice and Request for Comments entitled ***Expanding Broadband Deployment and Adoption by Addressing Regulatory Barriers and Encouraging Investment and Training.***

While many of the 30 questions involve answers that overlap to some extent, we shall focus on the questions 24 - 26 in **Section G. Issues Specific to Rural Areas.**

Pioneer Broadband is an ISP based in Houlton, Maine. We serve our customers with Internet and phone service primarily via DSL and FTTx delivery. Our customer base is located in Aroostook and Washington Counties, two of the most rural and economically depressed areas of Maine. We are well acquainted with the term "Rural Areas". Pioneer's experience has been with the FCC and USDA broadband programs.

We have applied for USDA Rural Development and FCC Rural Broadband Experiment grant funds for projects that would have covered unserved areas. However, the federal scoring methods appear to favor much larger scale projects and seem to be designed to be executed by large regional telco's.

Thus, Pioneer Broadband did not score sufficiently high enough to be considered for the FCC Rural Broadband Experiment (RBE). The USDA Rural Development grant requirements were designed to serve communities with "community centers", which are not common in Maine. Therefore regarding question 24: *What federal regulatory **barriers** can Executive Branch agencies **alter** to improve broadband access and adoption in rural areas?*

The FCC should continue its focus on Rural Broadband Experiments – indeed, it should expand the program. The FCC commissioners have observed that many of the LECs and RBOCs have no intention of expanding their network into rural areas, since the housing

density is not high enough to be considered “profitable”. Pioneer Broadband is a small CLEC that *has* been expanding unserved rural areas in Maine since 2001. The RBE application was scored by computer only, but projects in rural areas should also be scored by human assessment. The current (typical) scoring method is counter-productive to actually serving the unserved, since it gives high scores to projects that serve the greatest number of customers with the least amount of network infrastructure construction. Getting the “biggest bang for the buck” by the lowest bidder may render the best scores, but it will not reach the most rural areas where the unserved (all 50 million of them) are located.

USDA Rural Development’s Community Connect program falls into the same category for scoring, but has another problem that makes it nearly impossible for rural Maine to receive any funding. The Community Connect program requires that a “community center” be developed or constructed to provide 2 years of free service, which must be made available before and after regular business hours, plus nights and weekends – *in the unserved area!* Many Maine communities may have a school, library or town office with a space that might be suitable for a “community center, but it is probably located in a “served” area of the town... not out in the unserved areas where there isn’t likely to be a logical “center” of the community. Furthermore, given Maine’s cold climate, Mainer’s are likely to be indoors – at home - approximately 2/3rds of the year... and parents don’t necessarily want to take their children several miles to a community center in hazardous weather to work on homework. Therefore, given the lack of a community center and a hazardous cold climate, Pioneer proposes that USDA modify or waive the requirement for the establishment of a community center. One modification that might work would be to supply the low-income households with free use of a computer and Internet connectivity for 2 years.

25. Would spurring competition to offer broadband service in rural areas expand availability and, if so, what specific actions could Executive Branch agencies take in furtherance of this goal?

Essentially, this question digs into the real definition of “Unserved” vs. “Under-served”. The most rural areas probably cannot viably sustain multiple competitors... and the truly “Unserved” would be happy to have even one provider!

26. Because the predominant areas with limited or no broadband service tend to be rural, what specific provisions should Executive Branch agencies consider to facilitate broadband deployment and adoption in such rural areas?

The FCC and USDA (and other agencies that promote broadband) should focus on helping the companies that “want” to expand broadband service in rural areas. The companies that want to expand are probably not the regional Telco’s or cable companies.

It would be good to have real people with “boots on the ground” in our rural areas come and see what we’ve done and where we need to build. The USDA would seem to be the more logical agency to provide this effort, and the FCC should work with the USDA to help accomplish each other’s goals.

Pioneer Broadband has been the grateful recipient of grant funding for 36 projects in Maine. The funds were granted by the Connect Maine Authority (ConnectME). If the projects within individual companies, such as Pioneer, are too small to be considered for federal funding, then the FCC and

USDA should look at opportunities to put funds into the hands of the ConnectME Authority for the purpose of more equitable distribution.

Final Comments:

There is much more infrastructure that needs to be built to serve the “unserved” areas of rural Maine. Pioneer Broadband will continue to build as long as time and funds permit, but our funding to build has it’s organic limits. If federal funds become available, Pioneer will be pleased to commit the resources – time, money and energy - to reach out to the unserved and “cross the digital divide”!

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About Pioneer Broadband

Pioneer Broadband is an industry leading provider of Internet and communications services to communities across Northern and Eastern Maine. Pioneer operates facilities in 80 locations and delivers residential and business connectivity solutions.

Pioneer offers innovative and affordable broadband options, including DSL, cable and fiber connectivity solutions, all with local technical support and service staff.

Pioneer's Datacenter in Presque Isle provides a secure co-location facility for web servers, data storage and disaster recovery purposes.

Pioneer is the only Internet Service Provider in Maine to have connections to the Canadian Internet backbone, thus offering International diversity and redundancy that is unique among Maine’s providers.

Broadband delivery to rural Maine continues to be a core business strategy for Pioneer Broadband, serving rural Maine since its inception in 2001. Pioneer has received ConnectME grant funding for 36 rural projects in unserved areas of Northern Maine, including FTTH projects in Orient, Big Lake Township, New Limerick, Linneus, and Westfield.

Founded in 2001 and headquartered in Houlton, Maine, Pioneer Broadband is a privately owned, local Maine company. Learn more at www.PioneerBroadband.net.

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