
From: Marra, Lisa M <LMarra@cochise.az.gov>
Sent: Thursday, May 21, 2015 6:00 PM
To: BOCrfc2015
Subject: Public Comment - Broadband Deployment /Rural
Attachments: Cochise County AZ Broadband Rural Comments 5 21 15 NTIA.pdf

Dear Sir or Madam:

Attached please find our public comments regarding rural broadband service. We appreciate the Broadband Opportunity Council's assistance in furthering broadband in Southern Arizona for our residents. Please contact me directly should I be able to provide further information.

Thank you

Lisa M. Marra

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May 21, 2015

National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Ave NW, Room 4626
ATTN: Broadband Opportunity Council
Washington, DC 20230
Sent via email: BOCrfc2015@ntia.doc.gov

RE: Public Comment – Broadband Deployment/Rural

Dear Sir or Madam:

We are pleased to offer public comment and local government perspective on how the Federal Government can enhance broadband in our rural communities. We ask that you consider the **huge disparity between urban and rural areas and create funding structures to increase broadband access for under-served and rural communities**, along with reducing costs for potential low-income users.

Of the 6216 square miles in the County, 40% is private land, one of the highest in any county in the state. Cochise County also has 35% state ownership, making 75% of the land in Cochise County potentially available for development. The rest of the land includes a significant portion of State and Federal land – much of it in steep mountainous terrain and canyons. Most days our law enforcement personnel working on the Border of Mexico barely have cell phone service. Residents that are working on furthering their education online, or those working out of a small home-based business also suffer greatly. Access to high speed internet just doesn't happen in most of our County; in fact, it does not even come close to meeting the recent FCC upload and download speeds (25Mbps up and 3 Mbps down).

Cochise County, established in 1881, is located in the southeastern corner of Arizona. It is bordered by New Mexico to the east and the International Mexican border to the south. The County is located 205 miles south of the State Capital in Phoenix. It is home to 130,537 residents and nearly 300,000 visitors each year. We are expected to grow our population by another 50,000 residents in the next two decades. *This means our absolute*

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need for broadband technology in the fields of education, telemedicine, economic development and law enforcement will have reached the critical point long before then.

Cochise County is as big as Rhode Island and Connecticut combined. It is the **38th largest in the nation, by area**. We are home to 7 airports and 2 military installations. Over 22 cities, towns or communities, 7 incorporated areas, 35 places, 7 protected areas including *Chiricahua Nat'l Monument, Coronado Nat'l Forest and Memorial, Ft. Bowie National Historic Site, Kartchner Caverns State Park, Leslie Canyon Nat'l Wildlife Region, and San Pedro Riparian Nat'l Conservation Area* exist in our County. Numerous historical monuments and ghost towns including *Tombstone, listed on the National Historic Register*, play a vital role in our cultural heritage as well as provide industry and tourism for our area. The **incorporated areas** of Sierra Vista, Huachuca City, Benson, Bisbee, Tombstone, Douglas and Willcox are in close proximity to each other, and along with the **border community of Sonora Mexico, foster a shared workforce and enjoy cross-market commerce.**

All of Cochise County has been designated an Enterprise Zone. We are ripe for business development in the fields of **manufacturing, aerospace, education, government and technology.** We have two international ports of Entry. We are home to a large community college as well as a branch of the University of Arizona. Lack of affordable broadband service hurts our County.

Specifically, we offer comment on the following questions:

- **How can the federal government best promote coordination and use of federally-funded broadband assets?**
 - ✓ If Federal funds are distributed through USDA and the US Dept. of Commerce, how much is distributed by/to each agency?
 - ✓ What is the State share of funding from each source?
 - ✓ What are the metrics that are used to determine eligibility and successful implementation?
 - ✓ Utilize resources already available: We had a Federal grant for a gap/technology study done in our county – it's never been looked at by other Federal or state agencies for other broadband projects (i.e. Firstnet and GOVnet)
 - ✓ Make sure assets are affordable. For instance, GOVnet provided great service to obtain the equipment at little to no cost – yet the monthly service to use the equipment is exorbitant. We liken it to having received a new car; we love the car, it drives great, it's safe and easy to use, BUT we didn't know that special gas would cost \$10 a gallon and only be available at a certain station when we got to drive it and accepted the car for free.

- **What regulatory barriers exist within the agencies of the Executive Branch to the deployment of broadband infrastructure?**
 - ✓ There are vague descriptions of eligibility requirements and no metrics to determine best use. There should be more mandates placed on ILECs/CLEC/s to collaborate and share services when services are limited.
 - ✓ In Arizona a community can essentially be a provider but that requires a Switch and Maintenance, Repair, and Operations (MRO). Could the Federal Gov't subsidize the community or region for a minimum of two years to get started? Main providers would oppose, but provisions could be built in for them to grow their operations.
 - ✓ Reconsider FCC limits of where carriers can/cannot provide service. We have several large carriers in our region who have lines in and could expand service, but are not allowed to cross over into other carrier territory.

- **Are there specific regulations within the agencies of the Executive Branch that impede or restrict competition for broadband service?**
 - ✓ We are big proponents of partnering and P3 collaborations. Our Federal Gov't should be as well. Open up the programs to share service – i.e. Broadband for Schools/Education and telemedicine. If the infrastructure is being put into place for schools, open it for private and business use. Share and expand tower service from original design. We don't need and can't pay for, separate towers and service for every aspect of broadband.
 - ✓ Rural broadband needs secure and constant fiscal funding. Could it be tied into Defense Budget Bills? Many times Federal programs are made available with no pre-determined metrics or secure funding, to insure their success. And the funding is not consistent year after year to bring our programs up to national standards.

- **How can communities and regions incentivize service providers to offer broadband services, either wired or wireless, in rural and remote areas?**
 - ✓ Our large carriers insist they cover the entire State of Arizona. This may be true, but they certainly don't service all the State. The "broadband maps" used to show coverage are inaccurate and out-dated. We're not in as good of shape as these maps would lead agencies in Washington to believe.
 - ✓ Carriers admit they could open more service, but won't foot the bill and use their money to do so. Providers are supposed to share services where services are limited, and they don't get more limited than rural areas high in the desert mountains, yet there is reluctance for them to do so because they fear revenue loss and competition.
 - ✓ Another community in our region (Safford, AZ) developed a ring with multiple providers to share services. It was a great success. If the main carriers provided regional rural rings around communities (schools, government, base businesses), boutique providers could then provide service to premises considered "too small" for the big guys. This plan provides redundancy and with that data sites could land in rural Arizona with 24x7 day coverage. This could provide a tremendous boost to our rural region. This is a prime example of P3 partnerships.

- **What can the federal government do to make it easier for state, local, and tribal governments or organizations to access funding for broadband?**
 - ✓ Funds are given to areas that have proven loss of economic development because there is no broadband. In our case, we have significant areas and opportunities for growth, yet developers won't even look at us because we don't have broadband access. This is well documented with our Arizona Commerce Authority. It's easy to be ruled out when you are not even considered a viable option to begin with.
 - ✓ The best thing the Federal Gov't could do it to put in place understandable and fundable programs, and then let the communities develop and implement them.
 - ✓ Rural, local, and Tribes continue to ask for assistance in providing broadband capacity and speeds for current and future applications. Rural Arizona, and Cochise County, does not even come close to meeting the recent FCC upload and download speeds (25Mbps up and 3 Mbps down). Yet the carriers insist the State is "covered" under the official FCC Broadband maps. Discovery of various fiber runs throughout the state recently indicates the lanes are already there, we need government to work with private industry (CenturyLink, AT&T, Frontier, Cox, etc) so that our regions can have equitable access to share the infrastructure.

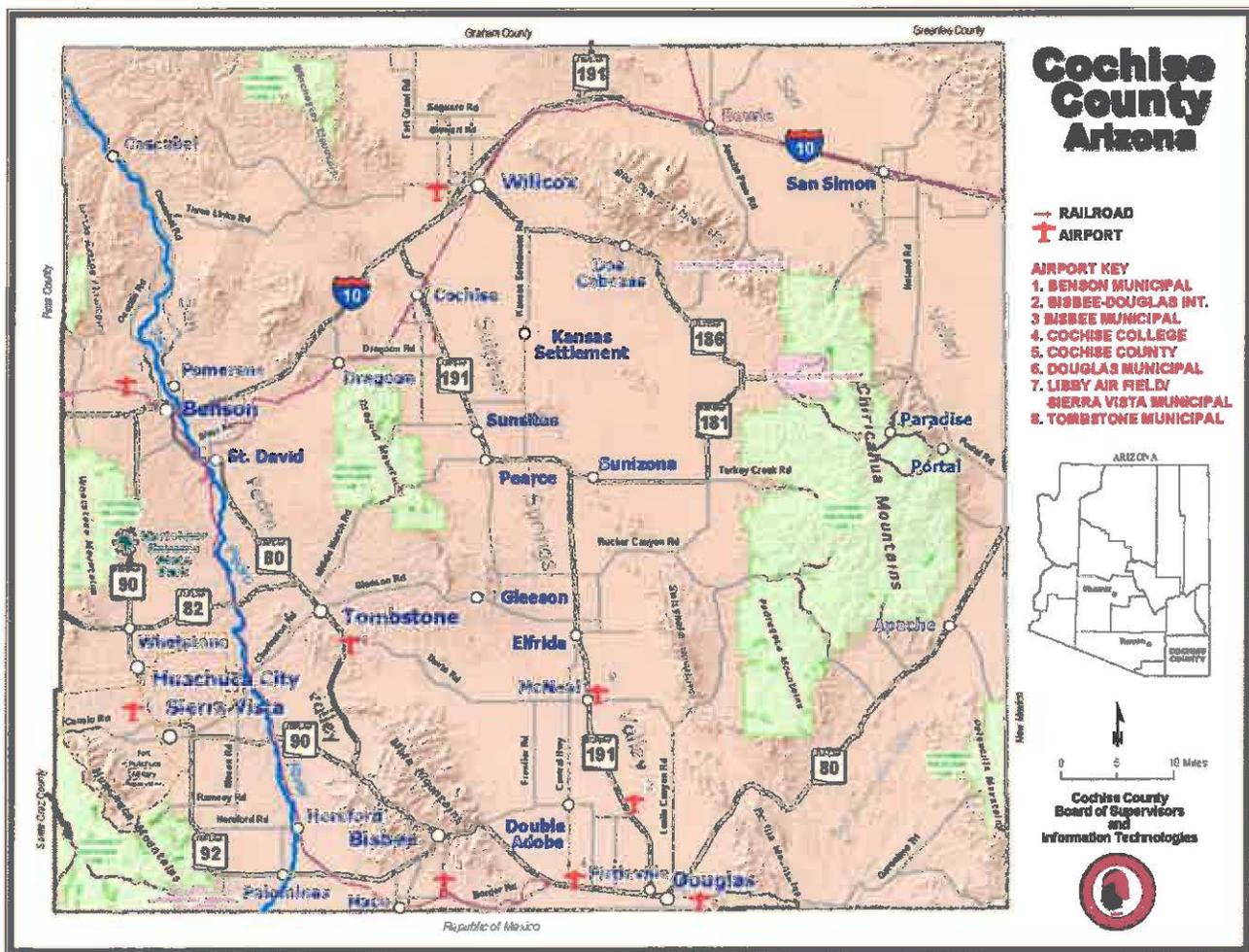
In closing, the Federal Government should announce broadband programs that have sufficient funding, eligibility requirements, and measurements that fit rural America's requirements. Instead of continuing to cut funding, look for ways to increase partnerships and growth that benefits our taxpayers. **Just because we choose to live in a rural county doesn't mean our residents should not be afforded the same opportunity for quality of life that residents in large cities receive when it comes to what is now a basic utility service.**

Sincerely,

Ann English

Ann English, Vice-Chairman
Cochise County Board of Supervisors

Total Area: 6,216 square miles



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