

## **Niagara-Orleans Regional Alliance - Rural Broadband Initiative**

In response to NTIA's Requests Feedback on Improving Broadband Availability Data dated May 30, 2018, we respectfully submit the following:

Elected officials in Niagara and Orleans Counties, led by Legislator David E. Godfrey and Legislator Lynne M. Johnson respectively, launched an effort to have the two counties work together to tackle common issues. Subsequently, by resolution of each Legislature, the "Niagara-Orleans Regional Alliance" (NORA) was formally established.

A topmost objective of the NORA collaboration was to facilitate high speed broadband internet access to every unserved household across the two counties. NORA retained a consultant to help identify and quantify gaps in coverage as well as assets from which to build upon. The goal was to provide all rural businesses, tourists, residents and students with Internet service equal to that of more advantaged areas.

Internet Service Provider (ISP) coverage maps were scrutinized and found to be unusable, as was the FCC's Form 477 data. NORA recognized the Form 477 data was based upon Census Blocks which, if one address had Internet access, the entire Census Block was considered covered. NORA considered this formula to be inverted, where as it should portray that if one address point in a Census block is not served, the entire Census block should be considered unserved in a rural area.

Consequently, NORA devised a process that would definitively identify unserved addresses. This was accomplished by training the town's Highway Departments to recognize and document Internet availability on every road in each of their towns. Also, to help any ISP vendor meet State funding requirements (i.e., they must offer price reductions for low-income families), each town assessor provided the necessary supporting income information. This innovative approach received the New York State Broadband Program Office's award for "Most Collaborative Broadband Program".

At the completion of this undertaking, NORA identified nearly 4,000 unserved address points in the ten towns of Orleans County and seven towns of Niagara County that opted into the study. The final report included detailed maps, high resolution photographs, vertical asset locations, and address-point segments showing both the targeted "un-served" areas as well as those areas with service (that may be reachable for "backhaul" if needed).

It was NORA's objective to secure funding through the New York State Broadband Program office, however the pending merger between Time Warner and Charter Communications resulted in "blocking" us from Round-1 and 2 funding because a majority of the Census Blocks in both counties were reserved by Time Warner.

Additionally, Round-3 of New York State's bidding process for broadband providers had unintentionally made it more difficult for residents in remote areas to get the service, because small vendors weren't likely to invest heavily in infrastructure to serve so few customers. The rules favored vendors who could extend broadband service at the lowest cost per household. That helped large companies like Spectrum, which already has the infrastructure in place and could expand at the lowest cost.

NORA continues to work with State and Federal elected officials to find ways to attract smaller Internet Service Providers to bring desperately needed high-speed, dependable, and affordable service to every home, every business, and to the last child on the last mile of Orleans and Niagara counties.

**Bottom Line:** The best source of broadband availability data is at the local level . . . road by road, address by address. It is doable when town and county governments work together to compile and report Internet unavailability which would be free of Census block inaccuracies and vendor overstated availability.

Submitted by:

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