

June 15, 2018

IURC General Counsel
RE: IUSF-Broadband Study
Indiana Utility Regulatory Commission
101 W Washington St., Ste. 1500 E
Indianapolis, IN 46204

On behalf of the membership of Indiana Farm Bureau, I would like to thank the Commission for asking the public to provide comment with respect to the Indiana Universal Service Fund and broadband deployment. We submit these comments on their behalf with the belief that they will help inform the recommendations of the committee for suggestions in how to move forward with the expansion of the critical infrastructure for broadband.

As a policy organization representing the users and potential users of broadband, we are not in possession of information at this time that provides specific details about the IUSF or factors that limit broadband expansion. Those details are more appropriately held by service providers. However, we do have some suggestions for additional information that should be publicly available so that sound policy decisions can be made to address the real need for broadband expansion throughout all parts of the state.

We know that broadband is a vital component to economic development. Without adequate broadband service, efforts to revitalize rural Indiana will be hindered.

Based upon information from broadband providers, we know that the cost of initial infrastructure investment is the largest hurdle to providing broadband, especially in sparsely populated areas of Indiana. Our members do believe that creative means must be used to provide resources for infrastructure investment. The General Assembly took the critical step in 2018 of creating a grant program for broadband infrastructure. However, the program as it exists lacks the financial resources to provide any true incentive to expanding broadband.

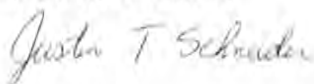
We support looking at the ability to use the IUSF for broadband deployment. This purpose is consistent with the existing purpose of the IUSF to encourage all households to have comparable telephone services at comparable prices. We also believe that Indiana must look beyond the IUSF at other potential funding sources to ensure that there is an immediate influx of enough financial resources to create urgency for broadband deployment.

With respect to broadband deployment, one of the most critical concerns is a lack of adequate data that shows broadband access across Indiana at fixed 25 Mbps/3 Mbps speeds. According to the 2018 FCC Broadband Deployment Report, that statistic is 98 percent of all Indiana residents. However, that same report states that only 58.5 percent of rural Indiana residents have broadband access at fixed 25 Mbps/3 Mbps speeds.

We do have concerns that even those numbers may overstate the percentage of the population with broadband access. We know that there have been efforts in other states to verify the accuracy of the data used to create maps of who has broadband coverage. We support efforts by Indiana to verify the accuracy of the data and urge that Indiana take a serious look at updating the maps for broadband deployment so that the state and broadband providers can target their resources to the areas that truly need an investment in broadband infrastructure. If there is a need, we are willing to assist the IURC and other state agencies in developing an outreach strategy to collect additional data from residents to determine the veracity of the data relied upon to determine where the government should support investment in broadband.

We thank you for your consideration of these comments. Questions regarding these comments can be addressed to the undersigned at 317-692-7835 or jschneider@infb.org.

Respectfully submitted,



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Director, State Government Relations