

**Minnesota Rural Broadband Coalition**

Margaret Anderson Kelliher

Chair, Governor’s Broadband Task Force

Minnesota Department of Employment and Economic Development   
332 Minnesota Street, Suite E200   
Saint Paul, MN 55101

June 4, 2018

Dear Chair Anderson Kelliher,

On behalf of our more than 70 coalition members, the Minnesota Rural Broadband Coalition wishes to thank the Governor’s Broadband Task Force for its support of broadband access across the state. Our coalition represents a broad cross-sector of statewide and community interests: education, agriculture, main street businesses, manufacturing, health care, and more. We strongly urge the task force to consider the following priorities as you develop and adopt recommendations for legislative and executive branches and help policy leaders understand the central role that robust broadband plays in rural communities.

**1. Continuation of the Task Force Review of Membership and Purpose:** We believe that the Governor’s Broadband Task Force is crucial to the success of the Border-to-Border Broadband Fund. It provides an opportunity for community members, advocates, providers, consumers, and others to have input and make recommendations on broadband policy in Minnesota.

The Coalition also believes that the Task Force should conduct a membership and representation review. We believe that, in its current form, broadband service providers have outsized representation compared to consumers, business owners, agriculture, and other important groups that are dedicated supporters of broadband funding.

**2. Fund the Border-to-Border Broadband Fund:** The grant program is essential to reaching the state broadband goals and allowing providers to extend and improve networks in the hardest to reach places in Minnesota. This program went unfunded for fiscal year 2019, and there remain significant portions of Minnesota, especially low-density rural areas, that continue to lack broadband service. The amount requested by all applicants continues far exceed the money available in the fund, showing the providers’ continued interest in participating in this program by providers and community applicants.

**3. Provide Multi-Year Funding for the Grant Program:** Applicants have expressed concern with the single-year funding model currently used by the Legislature. The time allowed to complete the complex task of blending engineering, finance, partnership agreements, and community support into a competitive application is not conducive for larger, long-term projects. Stable, biennial funding—incorporated into DEED’s base funding—would give confidence to providers and communities alike to continue to plan and build partnerships and prepare effective project proposals. The Coalition believes that funding the Grant Program as part of the base budget in FY 2020/21 is of highest priority.

**4. Continue to Support the Office of Broadband Development:** Development (OBD) is a symbol that improving broadband networks and services across the state is a shared, non-partisan priority for Minnesotans. The OBD provides a critical link between communities and providers, documenting successful infrastructure project design and management. We believe the Task Force should emphasize the office should be maintained in the future and enhanced to include a role in promoting the adoption and use of broadband, including broadband based economic development strategies, so that the highest possible value is gained from broadband infrastructure investments. As we move towards the 2019 budget session, funding for the OBD remains a priority for the coalition.

**5. Commitment to State Speed Goals Using Scalable Technology:** The Task Force should consider barriers and opportunities to meet the state 2026 speed goals of 100mbps download and 20mbps upload as well as meeting unserved and underserved areas of the state. We continue to support the current requirement that funded projects must meet the scalability requirements and work towards the 2026 state speed goal. Without scalable technology, the rural broadband problem is merely being kicked down the road, doing a disservice to the State’s investment and communities seeking meaningful digital inclusion. We recommend the task force emphasize that state investment in broadband should continue to fund future-resilient technology infrastructure that meets the current scalability standards and will provide benefits well beyond 2016.

**6. Review Mapping:** The Task Force should review the OBD’s mapping to assure alignment of advancement in technology, such as wireless, is accounted for in mapping of unserved and underserved. This review should ensure adequate measurement of meeting state speed goals and not allowing areas to slip through the cracks.

**7. Modify the Challenge Process:** The challenge process remains an obstacle to delivering the best network possible to communities. The Challenge Process is overprotective of incumbent providers and discourages non-incumbent providers from participating in the program over concerns their efforts will be undermined. The process does not require the incumbent to install the same or better service as proposed by the applicant, rather it allows a challenger to improve service ‒ not to 2026 speed goals ‒ but just enough to prevent a grant, to the detriment of the community. If a provider is not meeting a community’s needs, they should not be allowed to place undue burdens on access to state grants.

**8. Remove or Increase the $5 million cap on projects:** The $5 million grant cap per project may limit applications for project that propose to cover larger areas, including entire counties. Larger projects may allow for more cost-efficient network planning and construction.

**9. Evaluate New Broadband Solutions:** We encourage the Task Force to review and highlight opportunities for creative solutions to meeting the state’s broadband goals, including analysis of when such solutions are likely to be deployable. This may include marketing strategies, identifying barriers to creative solutions and recommending solutions.

Thank you for your work on behalf of the citizens of Minnesota and for your consideration of our priorities and recommendations.

Sincerely,



Nancy Hoffman

Chair, Minnesota Rural Broadband Coalition

# Minnesota Rural Broadband Coalition

-Arrowhead Regional Development

Commission

-Association of Minnesota Counties

-Cloquet Valley Internet Initiative

-Chisago County HRA/EDA

-Citizens Utility Board of Minnesota

-City of Winthrop

-Cloquet Valley Internet Initiative

-Coalition of Greater Minnesota Cities

-Community of Minnesota Resorts

-Community Technology Advisors Corp

-CTC

-Cooperative Network

-Cooperative Network Services

-Development Services, Inc

-East Central MN Educational Cable Cooperative

-East Central Regional Development Commission

- Economic Development Association of Minnesota

-EssentiHealth

-Finley Engineering

-Fond du Lac Tribal

Communications

-GPS 45:93

-Great River Energy

-Greater Minnesota Partnership

-Growth and Justice

-Headwaters Regional Development

Commission

-Hiawatha Broadband Communications

-IMPACT 20/20

-Institute for Local Self-Reliance

-Iron Range Economic Alliance

-ISD 317 Deer River

-Kanabec County EDA

-Kandiyohi County Economic Development

-League of Minnesota Cities

-Mid-Minnesota Development Commission

-Mille Lacs Energy Cooperative

-Leech Lake Tribal Telecommunications

-Lincoln County EDC

-Meeker County EDA

-MN Association of Community

Telecommunications and Administrators

-Minnesota Association of Professional

County Economic Developers

-Minnesota Association of Small Cities

- Minnesota Association of Professional County Economic Developers

-Minnesota Association of Townships

-Minnesota Farmers Union

-Minnesota Library Association

-Minnesota Municipal Utilities Association

-Minnesota Public Broadband Alliance

-Minnesota Rural Education Association

-Minnesota Rural Electric Association

-Minnesota Soybean Growers Association

-MN River Valley Education District

-MN Rural Counties Caucus

-MVTV Wireless

-National Joint Purchasing Alliance

-Nemadji Research Corporation

-Nobles County Economic Opportunity Network

-North Region Health Alliance

-North Star Township

-Northland Foundation

-Northwest Minnesota Foundation

-NW Regional Development Commission

-PCs for People

-Project FINE

-Range Association of Municipalities and Schools

-Redwing Ignite

-Region 5 Regional Development Commission

-Region Nine Development Commission

-Sherburne County EDA

-Schools for Equity in Education

- Southern Minnesota Beet Sugar Cooperative

-Southern Minnesota Initiative Foundation

-Southwest Initiative Foundation

-Southwest Regional Development Commission

-Turtle Island Communications

-Treacy Information Services

-Upper Minnesota Valley Regional Development

Commission

-West Central Initiative