



RURAL BROADBAND COMPANY, INC.

1050 Connecticut Ave., NW

10th floor

Washington, DC 20036

202-321-7969

tramos@urbroadband.com

www.urbroadband.com

To: Susan H. Hildreth, Director, Institute of Museum and Library Sciences - via email to:
comments@imls.gov.

From: Tony Ramos, President, Rural Broadband Company, Inc.

With contributions from:

Rex R. Helwig, Computer Manager, Finger Lakes Library System
David J. Karre, M.B.A, M.L.S., former CEO, Four County Library System
Steven Bachman, Executive Director, Four County Library System

Tony Castaldo, Computer & Technology Specialist
Harriet (Hattie) Grifo, Director, Cragmoor Free Library
Vincent (Skip) Becker, President & CEO/ La Paz Economic Development Board
Gary Horowitz, Project Area Liaison for Rural Broadband Company, Inc./ State of Arizona project area
David Salway, Program Director, New York State Broadband Program Office
Rick Ench, Consultant to the Colorado River Indian Tribes
Brandi Rozelle, Library Manager, Waterloo Library & Historical Society
Thomas A. Burke, Esquire, Health IT/Digital Readiness Policy Expert
Eric W. Will, II, President, Ranier Funding Services, Inc.

Date: April 23, 2014

Re: Comments to Institute of Museum and Library Sciences - For Submission to: Federal Communications Commission

Comments:

Dear Director Hildreth:

Pursuant to the invitation of the Institute of Museum and Library Sciences (IMLS) to submit comments to be provided to the Federal Communications Commission (the FCC), we provide the following. Please transmit these Comments to the FCC.

I had the privilege of attending the recent IMLS-sponsored public hearing at the Martin Luther King, Jr. Library on 'Libraries and Broadband: Urgency and Impact.'

First, on behalf of our stakeholders, we thank the Institute of Museum and Library Sciences for what was an incredibly well-organized event.

Second, we thank the current and immediate past Chairs of the FCC for taking the time out of their busy schedules to appear and make comments at the hearing.

We thank, also, all of the panelists, and of course, we thank you.

Our current projects cover large areas of rural New York and also an entire large rural county in the State of Arizona. Our Arizona project area covers La Paz County, which includes portions of the Colorado River Indian Tribes (CRIT) reservation lands.

Rural Broadband Company, Inc., located in Washington, D.C., is an independent company that provides professional services relative to funding for the expansion of digital readiness and voice/data/streaming video carrier-neutral infrastructure in rural America. Our services include project origination, organization, development, funding and fulfillment, and include seeking funding from securities offerings recently approved by the Securities and Exchange Commission (the SEC), as well as from Federal and State grants, rural loan programs, and other sources, where available.

1. National legislation: Although not a specific topic at the hearing, our policy staff, and therefore, we, believe that a National Broadband Act must be introduced into the Congress, and ultimately signed into law. We believe that such an Act can cover, in a comprehensive manner, both official government policy, now enshrined largely in the FCC's pronouncements, and also necessary enabling law that can be made to address the funding issue.

We believe that such legislation may not be that much different from previous large national infrastructure legislation. One comment by the Chairman made mention of President Lincoln's use of the telegraph, as made possible by Andrew Carnegie. But, in addition, President Lincoln also signed into law the Pacific Railroad Acts. Lincoln was an old railroad lawyer, an infrastructure guy at heart. Thus, as in Lincoln's time like the railroads, broadband infrastructure as a national Act, can and will become a reality.

Such legislation must include provisions of the type that were discussed at the hearing for our libraries.

Rural Broadband Company, Inc. will play a crucial role in that legislation.

2. Public/Private Partnerships: We say that a new era of public/private partnerships must now be opened. By and large such partnerships must now be forged and expanded to include private equity funding derived from new opportunities presented by rule changes at the SEC.

The Chairman's comments concerning the underlying philosophical/metaphysical tug between our Nation's traits of rugged individualism and a civil society that seeks to lift all those equally, cannot be lost on this discourse. That said, and however, the arc of the curve clearly allows for sufficient sway so that the emphasis on libraries will not skew too far in either direction. In short, we agree with the Chairman that both the marketplace and good government can work together for the betterment of technology advances for libraries. As further comments made clear, good libraries are, by and large, a bipartisan and worthy political goal.

With Title II JOBS Act rules, effective September 23, 2010, the SEC allowed this new era to begin. Such exempt limited offerings can now be posted online, so that this \$42 billion pool of small investors may capture the magic of broadband expansion projects. Our efforts in this regard have already allowed us to upload and register some \$90 million in funding opportunities onto the website of the SEC. Ours was the first such company to post JOBS Act campaigns onto both eBay and Amazon. Within all of those opportunities, there are over 100 libraries which would ultimately become beneficiaries of such funding.

In the near future, Title III of the JOBS Act rules, crowdfunding, will take effect. This vehicle, too, will allow the small investor to participate in our projects. Such investment opportunities will provide an even greater vehicle for the expansion of rural carrier-neutral voice/data/streaming video expansion and digital readiness projects. The rules will allow for the further opportunities of making the libraries in our project areas the beneficiaries of those opportunities. With such funding we can provide more bandwidth and more gadgets, as well as more digital readiness training.

At the same time, IMLS and the FCC must be made aware that current 'crowdfunding' sites, like Kickstarter, Indiegogo, Fundly and others will likely turn from their current, donations-based business plan to one that embraces Title III. We believe that this turn will take place immediately upon the effective date of Title III rules. These companies, and others, really will have no alternative, as investors will likely seek an equity share over a t-shirt in exchange for the investment. Thus, the likelihood of posting carrier-neutral voice/data/streaming video infrastructure and digital readiness projects on such popular sites will greatly accelerate funding opportunities. The libraries will be among the biggest winners because they will be made as beneficiaries of all of our projects.

In fact, we have already originated digital readiness programs. In this year, 2014, we created the 'Lend-A-Gadget' program, so that libraries can lend out tablets, iPads and others, checked out just like books. We have already posted such projects on the donations-based sites, like RocketHub, Indiegogo and Fundly. As of this writing, we are finalizing our first such project for Kickstarter. An impressive library computer expert, Tony Castaldo, has taken the lead on all things technology, to help us with this project.



At the same time, innovative library executives, like Steven Bachman, Executive Director of Four County Library System, continue to work hard to make sure that broadband and digital readiness reach into the

most remote areas of rural New York. With our company, Mr. Bachman and others recently posted the Super Cybermobile fundraiser on Kickstarter.

Thus, while all of us give many thanks to past and ongoing public/private partnerships, like that of the Bill and Melinda Gates Foundation, current and new funding opportunities must be captured and conformed to the infrastructure and digital readiness needs that were so eloquently discussed at the hearing.

3. Making the Technology Work in Your Project Area: We believe that there must be what innovator and entrepreneur, Steve Jobs, called the 'whole product theory' for the inclusion of rural libraries. By that, Jobs meant, according to one of his biographers, a design that allowed for the user to experience style and functionality, as opposed to just having a gadget that works on a utilitarian level. We believe that Jobs' concept may be utilized for a 'whole project theory,' one that will draw users to increase digital readiness, and therefore, user adoption rates. The '1 Gig. City' must become a reality for rural America.

Where possible we must bring dark fiber to the project area, for the '1 Gig' that was discussed at the hearing. With libraries as engineering pinpoints on a map, we can and we will pursue a dark fiber '1 Gig' capability so that, libraries, among other community anchor institutions, can benefit with help from the E-Rate.

There must be an acknowledgement that a new infrastructure technology, 'white space,' can and will play a role. The FCC gave birth to white space with its two memoranda in the year 2012. The first, essentially defining white space, and the second providing for the data administrators of it. This new technology, with its vast benefits and also its limits, holds untold promise for rural America, once companies like ours, in a commercial setting, begin to formulate successful business plans for them.

With all of this said, we remain thankful to Rex Helwig, one of our own pioneers. Mr. Helwig, who is the computer manager of Finger Lakes Library System, has taken the lead in assisting us in configuring a project area that consists of four of his libraries in the general area that is Cortland County, New York. As our economist and engineers come close to the definition of that project area, we continue to count on Rex as our local leader and project area liaison. We anticipate the City of Cortland being added to the very few '1 Gig. Cities' that now exist in rural America. Such an addition would fuel economic development in the crucial Cortland-to-Ithaca corridor, which includes Cornell University.



White space technology as a part of this project area cannot be overlooked by the libraries. This technology, much like the WI-FI that was discussed at the hearing, is of a slower speed, it's true. A wide area reach, and more than enough bandwidth to compliment the traditional Internet connection inside

the library, with the WI-FI to the parking lot, and beyond makes it a desirable 'in-fill' part of the technology puzzle for any rural area.

In conclusion, we seek a way forward with a National Broadband Act, with both government and private equity funding for carrier-neutral voice/data/streaming video infrastructure, and for digital readiness programs. In addition, we think that, right now, the unique convergence and the near simultaneous timing, in 2012, of both the JOBS Act and of the FCC memoranda on white space, afford an entirely new paradigm, both for funding and for technology expansion for our libraries.

We thank you for the opportunity of allowing us to comment.

Very respectfully,

Tony Ramos