



June 14, 2010

The Honorable Tom Vilsack
Secretary
U.S. Department of Agriculture
Whitten Building, Room 200-A
1400 Independence Avenue, SW
Washington, D.C. 20250

Dear Secretary Vilsack:

Thank you for your commitment to the future of rural America. We look forward to working with you to meet the challenges that our nation's citizens face in the communications arena.

The National Telecommunications Cooperative Association, the Organization for the Promotion and Advancement of Small Telecommunications Companies, and the Western Telecommunications Alliance are writing to express concern about the negative impact the National Broadband Plan (NBP) would have on rural areas and the people living in these areas. The staff of the Federal Communications Commission (FCC) has developed a proposal for broadband deployment support and regulation that would create a rural/urban digital divide and put existing rural broadband networks at risk. This proposal not only creates uncertainty, it jeopardizes infrastructure investment, future debt equity loans for carriers, and the repayment of Rural Utilities Service (RUS) loans.


There is grave concern about the ability of our members to pay back existing communications loans made by RUS. Some rural communications providers that have been approved for Broadband Initiative Program loans under the American Recovery and Reinvestment Act are now reconsidering the viability of repaying these loans in the future if the NBP is implemented in its current form.

For decades, small independent communications carriers have invested in networks in rural areas based on a relatively predictable regulatory structure, Universal Service Fund support and loans from the RUS, all of which have led to success in the deployment of voice and broadband service. As proposed, the NBP abandons this successful policy approach endangering our national statutory goal of affordable and comparable communications service for all consumers, including those living in rural and insular areas. Communications providers and policy makers need to strive for viable and robust broadband networks in rural areas while making sure that the services are affordable.

Communications providers that serve rural America have worked hard to develop access to high-speed broadband for their residential, agricultural and small business consumers. The FCC's broadband proposals contained in the National Broadband Plan are detrimental to the current and future broadband networks in rural communities.

We appreciate the department's longstanding dedication to deploying state-of-the-art communications infrastructure in rural America and hope we can count on you to help in the efforts to redirect the FCC's National Broadband Plan for the betterment of our communities.

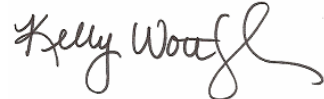
Sincerely,



Michael E. Brunner
Chief Executive Officer
NTCA



John N. Rose
President
OPASTCO



Kelly Worthington
Executive Vice President
WTA

cc: Under Secretary Dallas Tonsager
RUS Administrator Jonathan Adelstein
Members of the U.S. House of Representatives Committee on Agriculture
Members of the U.S. Senate Committee on Agriculture, Nutrition and Forestry