cc: Amy Bender

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Respectfully submitted

WIA Regulatory Counsel
certij 1 Duty

Public record of the referenced proceeding.

WIA regulations and their definitions are under development and implementation as soon as possible.

WIA is not the first revision of the "urban" and "rural" definitions used in the \textit{Federal Register}, but this revised definition would allow schools and libraries in communities with more than 25,000 individuals to include urban areas (communities of more than 50,000 people) and for E-Rate and distance learning purposes to include unincorporated areas (communities of more than 2,000 people) under the definition of "urban." WIA is intended to support proposals by various interested parties to revise further the definition of "urban." Without this change, the definition of "urban" and "rural" would be inconsistent and difficult to apply.

WIA proposed that the recent addition of "urban clusters" of 2,000 people or more to the definition of "urban" would be particularly problematic for the definition of "rural." WIA notes that the Census Bureau has repeatedly indicated that there is no clear or consistent definition of "rural." WIA is not aware of any school or library district that would change the definition of "urban" or "rural" based on the proposed change.

On Monday, November 3, 2014, Donna Overstreet, President, and Gerald Dutty, President, were present. WIA -

Dear Ms. Dorton:

RE: WC Document No. 13-184

Washington, DC 20574
441 12th Street, SW
Federal Communications Commission
Marlene H. Miller, Secretary

November 5, 2014

Advocates for Rural Broadband