OMEGA is very grateful to our friends at Buckeye Hills Regional Council for sharing their Broadband Policy and allowing us to adopt a version for our region. By working together, the agencies that serve the Appalachian and Rural Communities of Ohio will positively effect change and provide a pathway for enhanced broadband deployment throughout rural Ohio.

The Ohio Mid-Eastern Governments Association (OMEGA), working collaboratively with our members in Belmont, Carroll, Columbiana, Coshocton, Guernsey, Harrison, Holmes, Jefferson, Muskingum, and Tuscarawas Counties, is dedicated to growing strong, vibrant communities and improving the lives of 590,660 residents in rural eastern Appalachian Ohio.

BROADBAND POLICY PRIORITIES

The absence of broadband service places substantial constraints upon the economic growth, social, and cultural aspects of our region. Due to the detrimental impact this has had upon the region, the OMEGA Executive Committee has adopted the following Broadband Policy Priorities:

1. **Improve the accuracy and veracity of broadband mapping by drilling down to the actual service locations.**

2. **Advance the region's economic development through Internet-enabled education, healthcare, transportation, and workforce development.**

3. **Leave no one behind by extending broadband to all households and businesses, delivering robust communication services.**

4. **Use fiber to connect local government facilities in Appalachia in order to increase efficiency of management and delivery of municipal services.**

IMPLEMENTATION

Collaboration among rural Ohio advocates will propel expansion of broadband in our communities and across the rural expanse. Building broadband infrastructure takes years – we urgently need to get started.

Mapping

- Existing maps significantly overstate broadband availability in the "rural expanse"[1] by a factor of ten or more.
- Inaccurate mapping precludes funding for unserved areas due to "carve-outs" meant to avoid duplicative efforts and prevent so-called "over-building."
- Current Connected Nation-Ohio efforts to refine the maps will purportedly resolve a portion of the mapping inaccuracies.
- Mapping the individual service locations through pairing satellite images with public records will quickly identify actual service locations.[2]
- Confronted with such data, broadband providers would be forced to verify or deny their ability to serve specific locations rather than providing coverage information based on general areas designated by census blocks or shape-files.

Securing Adequate Funding

- The rural expanse requires substantial and ongoing subsidies to incentivize carriers to extend broadband service because the low population densities do not generate sufficient revenue to create an acceptable business case.
- Rugged terrain and plentiful foliage cover reduce the range and effectiveness of both fixed and mobile wireless solutions.
- Multiple funding sources, both existing and proposed, can be combined to address the subsidy requirements. Existing funding programs from the Federal Communications Commission (FCC), United States Department of Agriculture (USDA), and/or Appalachian Regional Commission (ARC) could be combined with federal infrastructure and proposed state broadband funding.
- To competitively respond to funding opportunities, we must proactively engineer solutions and form deployment partnerships.

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[1] "Rural expanse" defined as areas with twenty or fewer households per square mile.
[2] E.g. methodology advanced by US Telecom (estimated $12 million for the entire nation)

- Share technical design best practices across representative study areas, which will generate proformas for project budgets and trigger conversations with policy makers regarding the magnitude of required subsidies.
- Utilizing technical design best practices, we will:
  - Educate funders;
  - Inform local officials and influencers; and
  - Recruit support from U.S. Representatives and Senators.
- FCC Connect America Fund is the largest existing source of funding.
  - The FCC Universal Service fund, spending more than $7 billion per year, has for decades ensured that rural residents can affordably obtain telephone services. The FCC has logically shifted these funds to support broadband services under the Connect America Fund (CAF).
  - The current FCC subsidy formula does not reflect the relatively higher costs of servicing households in the rugged terrain of our sparsely populated rural areas.[3]
- Encourage the State of Ohio to help the unserved and improve competitiveness for Federal funds by:
  - Advocating for mapping at the individual service location level;
  - Creating a broadband plan that establishes priorities;
  - Extending electrical easements for fiber installations to lower costs and speed implementation;[4] and
  - Providing upfront match for Federal grant applications and reverse auctions.

Economic Development

- High-quality broadband services deliver positive economic development impact throughout the region including:
  - Keeping farmers connected to markets and suppliers;
  - Providing remote monitoring and control, e.g. oil & gas industry;
  - Delivering crucial communications services to industrial parks and spec buildings, essential in attracting all types of enterprises; and
  - Improving education, workforce development, healthcare services, and transportation networks.

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[3] As evidenced by the failure of the FCC to attract any bidders for the opportunities in southern and eastern Ohio in the 2018 Auction 903. In contrast, areas of flat and largely open terrain were bid upon and awarded across the country.
[4] As has been done in Indiana (2017), Alabama (2019), and other states.

Education – Internet access has become crucial for students in rural areas so they can:

✓ Engage in university, trade-focused, and advanced placement coursework which are increasingly delivered online.
✓ Complete assignments, many of which now all but require the availability of home-accessible broadband, the so-called "homework gap"; and
✓ Participate in "snow day" K-12 school sessions, an approach becoming increasingly common in more school districts.

Workforce Development – residential and small business broadband will support displaced and "upskilling" workers so they can:

✓ Engage in commercial training programs delivered at least partially online;
✓ Work from home in an ever-widening set of career options including customer support, technical assistance, software development, and consulting; and
✓ Search and apply for jobs online including the trend toward remote video conference interviews.

Healthcare – connecting our remote population to essential services from their homes will enable:

✓ Delivery of remote healthcare services, proven to reduce rates of hospitalizations;
✓ Participation in counseling sessions for mental health issues including addiction treatment;
✓ Communication with family and friends, lessening the social isolation so often encountered in rural settings, particularly by the elderly;
✓ Expand use of telemedicine in rural areas especially those areas impacted by hospital closures and lack of medical professionals; and
✓ Bridge healthcare gap between rural and urban areas.

Transportation – connecting people, especially senior citizens and the disabled, to work, education, non-emergency medical appointments, and other daily life activities:

✓ Broadband-based scheduling technologies increase ridership, improve efficiencies, and reduce costs;
✓ Provides more options for transportation to work;
✓ Allows home-bound residents to maintain connectivity with community; and
✓ Expands research/use of connected/autonomous vehicles in rural areas.

Building Robust Networks

- We need to build networks that meet the long-term capacity needs of our rural areas rather than just satisfying current minimum requirements.
  - Gaps in urban/rural availability and performance continue to widen.
  - Durable solutions will most cost-effectively utilize government subsidies.
- Add quality of service and prompt restoration times as part of the commitment from carriers receiving government funding.
  - Reports abound of service outages from events as common as rainfall with delays in repairs lasting weeks.
  - A large gap between advertised and actual response times for repairs reveals a lack of capacity due to over-subscription which results in a failure to meet current industry standards.
  - Thus, we will advocate for provisions in the funding programs regarding response times to outages and minimum end-to-end performance of the services.
- In all cases, we will target commercial entities such as carriers and electrical co-ops to build and operate the networks.
- OMEGA's roles will include planning, analysis, advocacy, and focusing on accountability for companies receiving government funding.

Policy Recommendations for Broadband

The Ohio Mid-Eastern Governments Association is a Council of Governments that serves ten counties in eastern Appalachian Ohio: Belmont, Carroll, Columbiana, Coshocton, Guernsey, Harrison, Holmes, Jefferson, Muskingum, and Tuscarawas Counties. OMEGA's mission is to provide a pathway to enhance community and economic growth in the region. Access to broadband is essential for creating economic opportunities and community development.

Therefore, OMEGA offers the following policy recommendations for broadband in the state of Ohio:

1. **Create a state broadband fund that ensures sufficient resources are available** across the state for broadband deployment projects that directly connect 100% of unserved and underserved households and businesses in a designated service area.

   a. **Use a portion of the state fund to award zero-match planning grants** to enable regional organizations to leverage state resources to develop successful applications for federal broadband funding.

   b. **Establish a steering committee comprised of at least one regional organization** to review applications for funding under the proposed program to ensure that the projects are meeting qualifications.

2. **Create a diverse statewide task force of experts to develop recommendations on how to close the rural-urban divide on broadband access.** The task force should focus on possible funding solutions for delivering broadband to rural Ohio and review potential legislative actions that could reinforce those solutions.

3. **Seek a streamlined right-of-way approval process for broadband fiber installation** to encourage easier build out.