



NATIONAL GRANGE

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American Values. Hometown Roots.

The Honorable Janet Yellen
Secretary of the Treasury
U.S. Department of the Treasury
1500 Pennsylvania Avenue, NW
Washington, D.C. 20220

June 11, 2021

Dear Secretary Yellen,

The National Grange is writing today in support of the Interim Final Rule recently issued by the Department of the Treasury which, in the implementation of the Coronavirus State and Local Recovery Funds established under the American Rescue Plan Act, defines unserved or underserved areas of the country as those lacking access to a wireline broadband connection capable of reliably delivering minimum speeds of 25 Mbps download and 3 Mbps upload (commonly referred to as 25/3).

The areas that face the most difficulty accessing broadband often include the rural farm and ranch communities across our country, who have been left behind for too long. When farmers and ranchers cannot access the high-tech agricultural tools needed to compete in the global 21st century economy, those who operate in these unserved areas, and the communities they serve and live in, stand at a significant disadvantage. They also face decreased agricultural productivity, which negatively impacts the entire rural economy. Moreover, without access, these communities miss out on the educational, health and other benefits that so many other communities across the country currently enjoy. We must ensure that these farmers and ranchers, and their communities, do not fall further behind, due to a lack of broadband access.

By specifically defining areas unable to reliably deliver minimum speeds of 25/3 Mbps as unserved or underserved, the Interim Final Rule sets the right priority by ensuring that government funding first reaches the truly unserved areas of the country, including farms, ranches, their households and their neighbors, that have historically been persistently unconnected. Prioritizing this critical funding in this way gives these communities a chance to catch up with their suburban and urban neighbors. While some have expressed a desire to set a higher speed threshold for determining unserved areas, doing so would be problematic as it will only divert government funding to more densely populated urban and suburban locations that are

currently adequately served with more than sufficient broadband speeds. The Interim Final Rule sets the right balance by establishing an eligibility standard that ensures unserved areas will finally get connected while also setting a performance (or capability) standard that ensures government funds are used to build robust broadband networks.

The Interim Final Rule provides a major opportunity to quickly connect more Americans – including our farmers and ranchers, as well as our educators, students, business owners, doctors, patients, and more. The National Grange applauds the Department of the Treasury for issuing the rule and looks forward to continuing to support our partners in the government to ensure more rural Americans get access to the broadband services they need.

Sincerely,

A handwritten signature in cursive script that reads "Betsy E. Huber".

Betsy Huber, President
The National Grange