



NORTHWOODS ASSOCIATION OF REALTORS®, INC.

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"Promoting and preserving the quality of life in the Northwoods through affordable housing and governmental advocacy"

January 29th, 2018

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

To the Federal Communications Commission:

My name is Shelly Cole and I am the President of the Northwoods Association of REALTORS® which represents over 400 Realtors serving 7 counties in north-central Wisconsin. The Northwoods region has many hundreds of lakes and state/national forests, and as such is a very popular vacation destination. Around half of our properties are secondary homes owned by folks from the larger cities downstate, Chicagoland and various other locations where broadband internet is ubiquitous.

When vacationers inevitably fall in love with the natural beauty of our Northwoods, they often contact a local REALTOR to help them find their Northwoods dream home. One of the most often-asked questions is whether a property has access to broadband internet, and unfortunately the answer is often either "no" or "that depends on your definition of broadband". Some of our towns have true broadband (25mbps as defined by the FCC) in localized areas through a cable provider, but the majority of our homes are in other areas like lakefronts or nestled between the pines on parcels large enough to offer peace and privacy. While some lakefront properties have prices with two commas, they are often stuck with internet speeds measured by a single digit. One of the biggest impediments to matching buyers from urban areas (who are accustomed to broadband) with their Northwoods Camelot is finding a home where they can still Skype with their family, watch a movie on Netflix, and/or conduct important business and education online.

A [recent article by National Economics Editorial](#) noted that Americans have paid \$400 billion to telecom companies for fiber optic upgrades that have not materialized. While fiber optic is the fastest internet pipeline possible, we recognize that it is cost prohibitive to bury cable in rural areas with lower population densities such as ours. New directional findings in [this Rural Broadband Strategy white paper](#) suggest that combining technologies including TV white spaces is the most efficient way to offer broadband to rural areas such as ours with population densities under 200 per square mile. In order to take advantage of TV white spaces, carriers need the FCC to allow for unlicensed, continued use of at least three channels below 700 MHz in every market in the country. Additionally, the FCC must focus on collecting data to identify opportunities and challenges to delivering broadband internet to every American.

In a [recent speech](#) FCC Chairman Ajit Pai delivered to the IIC, he remarked on the merits of "light touch" legislation. We agree with his assertion and believe that granting unlicensed access to TV white spaces qualifies as "light touch" versus the more top-down approach of selling licensed access. It was promising to learn from the Chairman that the FCC is offering unlicensed access in the upper 6GHz band, but we are aware of no similar unlicensed access afforded within the TV white spaces spectrum that would better serve rural communities with lower population densities. President Trump earlier this month issued an [Executive Order to promote rural broadband](#), and we hope the FCC will heed his and our shared concern by opening unlicensed access to TV white spaces as it is already doing for other parts of the spectrum.

This technology has already proven successful in several projects in the U.S. and abroad, and we urge the FCC to enact permanent policies to ensure that TV white space can be used at a commercial scale. Lack of broadband access has been a big impediment to home values and growth in our region and others. Please take the appropriate actions to bring broadband to all Americans.

Sincerely,

Shelly Cole, President
Northwoods Association of REALTORS®

