

2376 W Main St  
Millville, NJ 08332  
19 March 2014

Board of Public Utilities  
44 So Clinton Av, 9<sup>th</sup> Floor  
PO BOX 350  
Trenton, NJ 08625-0350

Re: IN THE MATTER OF VERIZON NEW JERSEY, INC'S ALLEGED FAILURE TO COMPLY WITH  
OPPORTUNITY NEW JERSEY COMMITMENTS

ATTN: Kristi Izzo, Secretary of the Board

Dear Secretary Izzo,

As a resident of the most telecommunication infrastructure deprived county in this State, I object to the Stipulation of Settlement as contained in Docket No. TO12020155.

One very troubling stipulation (page 3, paragraph 1.a.ii), will ensure that Verizon will not have to string another road-mile of fiber optic wire unless the area will "have no access to 4G-based wireless service." Unfortunately, Verizon has consistently overstated its cellular coverage, both to the state and on its own website. Those of us who live and work in the rural sections of the county understand that wireless coverage is spotty and unreliable. There needs to be an objective, 3rd-party verification as to whether a given area has 4G-based wireless service.

In addition, and unlike wired broadband access, wireless access is subject to data cap pricing making it a much more expensive solution for residents of the poorest county in the state.

Also very troubling is the stipulation on page 4, paragraph 3, which attempts to define broadband as data transmission services at rates no less than today's minimum DSL speed, which is severely outdated and does not meet the current federal standard of 4 Mbps downstream/1Mbps upstream. Any attempt to define broadband should recognize that technology does not stand still and, if anything, it should be tied to the current national standard. Furthermore, based on the DSL expansion in Greenwich, Internet access via deteriorating copper lines is not a solution; loss of connection is so frequent that DSL becomes unusable.

The proposed stipulation will also, in effect, punish municipalities which have been successful in the preservation of farmland and open space, because they are being good stewards. It must be recognized that these communities will never have the population densities to cost-justify telecommunications infrastructure build out. There should be some "quid pro quo" consideration built into each and every state/service provider agreement affecting the deployment of current technologies; otherwise, the state

inadvertently compromises the public's investment in farmland preservation by not ensuring that farm businesses remain viable over the long term. Cumberland County is a farming area and accounts for about to 20 percent of the State's agri-business.

Finally, it must be noted that the telecommunications deficiency in Cumberland County, if left as is, will pose a great risk to existing businesses because they lose their ability to compete on any level: locally, regionally, nationally, or globally. And, it's not just businesses...students, employees, the unemployed, etc. This is not acceptable for one of the poorest counties in this State!

Accordingly, we must insist that the BPU hold Verizon to its Opportunity NJ commitment to deploy broadband throughout the state, as they have received the money from NJ consumers to do so. Surely, there is enough ongoing profit from infrastructure already deployed in the densest sections of the most densely populated state in the nation to offset the capital investment necessary to build out in less populated areas. To not fulfill their commitment to other rural communities like Hopewell creates a devastating impact to local economies, housing values, and to the education of our children. Having equal opportunity truly means having equal access to today's technology.

Very truly yours,

*Deborah Boykin-Greenberg*