

Cumberland County Board of Agriculture

Extension Education Center
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Millville, NJ 08332
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March 21, 2014

New Jersey Board of Public Utilities
Kristi Izzo, Secretary
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, NJ 08625-0350

RE: DOCKET NO. TO12020155
IN THE MATTER OF VERIZON NEW JERSEY, INC.'S ALLEGED FAILURE TO
COMPLY WITH OPPORTUNITY NEW JERSEY COMMITMENTS

Dear Ms. Izzo:

Cumberland County in southern New Jersey is a predominantly rural area with nearly 70,000 acres of farmland, the production of which accounts for nearly 20% of the state's agricultural market value. An ongoing commitment to protect the very asset that drives our county's economic engine has resulted in the permanent preservation of over 17,000 acres in our county's and state's farmland preservation program, giving our county a fifth place ranking statewide in acres preserved.

Several rural areas throughout Cumberland County remain cut off from the enabling technologies necessary for business growth at a time when economic growth is urgently needed. This adversely affects our farms in obtaining needed information, in being able to know what is going on in markets around the country and the nation and in being able to market our products competitively. The opportunities for farm businesses are of such magnitude that we are compelled to voice our strong opposition to the proposed Stipulation of Settlement in the above referenced matter. The confluence of several factors, fueled by the growing consumer demand for local fresh food and on-farm activities, means that the Garden State can ill afford to support the current technological stranglehold on its food and agriculture industry. Specific concerns and reasons for opposition are as follows:

1. The Broadband Request Process is one that relies on flawed broadband coverage data and will yield disastrous decisions for rural agricultural communities. Verizon has consistently overstated its cellular coverage, both on its website and as reported to the state under the State Broadband Initiative. They are not alone; overstated cellular coverage, combined with the overstated coverage data submitted by Comcast (our only other service provider of wire-based access) will effectively exclude our agricultural areas from any wire-based telecommunications infrastructure build out. We implore the BPU to validate broadband coverage data via an objective third party with the appropriate telecommunications expertise.
2. Farmers already using DSL, satellite, or wireless Internet access know firsthand that these access methods are insufficient and often unreliable for current operations, let alone

the growing data demands of precision agriculture, a management practice that improves crop inputs, meets environmental constraints and increases farm profitability and viability. In addition to being inadequate, data cap pricing and/or limits make cellular and/or satellite solutions more expensive. Precision agriculture calls for robust telecommunications infrastructure, i.e., "fiber to the farm; wireless to the tractor".

3. The smaller the area of telecommunications deficiency, the greater the risk to existing businesses because they lose their ability to compete on any level: locally, regionally, nationally or globally. This is especially true for farms and nurseries because the farmer or nursery grower cannot relocate his/her land to where the infrastructure exists; the infrastructure must come to the farmer/grower.

4. Communities successful in the preservation of farmland and open space continue to be penalized for being good stewards of the land. Because these communities will never have the population densities to cost-justify infrastructure buildout, there must be some *quid pro quo* consideration built into each and every state/service provider agreement affecting the deployment of current telecommunications 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.

For these reasons, the Cumberland County Board of Agriculture urges the New Jersey Board of Public Utilities to withhold approval of this proposed agreement and require Verizon NJ to fully meet its obligations under Opportunity NJ. To do so will release the current technological drought of the state's garden spots and nourish the seeds of innovation and productivity. The future of New Jersey agriculture rests in your hands.

Sincerely,

Shirley Todd Kline, President
Cumberland County Board of Agriculture

CC: NJ Governor Chris Christy
NJ State Senator Jeff Van Dres - District 1
NJ Assemblyman Sgt. Bob Andrzejczak - District 1
NJ Assemblyman Sam Fiocchi - District 1
NJ State Senator Stephen Sweeney - District 3
NJ Assemblyman John Burzichelli - District 3
NJ Assemblywoman Celeste Riley - District 3
NJ Secretary of Agriculture Douglas Fisher
Cumberland County Board of Chosen Freeholders
Ed Purcell, Esq., League of Municipalities