

Communications  
Workers of America  
AFL-CIO, CLC

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September 21, 2010

Earl E. Devaney, Chairman  
Recovery and Accountability and Transparency Board  
P.O. Box 27545  
Washington, D.C. 20038-7958

Lawrence E. Strickling  
Assistant Secretary of Commerce for Communications and Information  
National Telecommunications and Information Administration  
U.S. Department of Commerce  
1401 Constitution Ave., NW  
Washington, DC 20230

Re: CityNet Formal Protest of BTOP Award to Executive  
Office of the State of West Virginia

Dear Sirs:

I am writing in response to the recent correspondence from Mr. James R.J. Martin, President and CEO of CityNet regard entitled. "Formal Protest of BTOP Award to Executive Office of the State of West Virginia." While I am sure that the Executive Office of the State of West Virginia (EOWV) will file a detailed response to Mr. Martin's correspondence, on behalf of the Communications Workers of America, AFL-CIO, which represents West Virginians who work hard everyday to bring telecommunications - including broadband - to the people of West Virginia, I wanted to let you know of our support for the National Telecommunications and Information Administration's (NTIA) award to the EOWV and the ongoing work that the Office is currently undertaking.

With regard to Mr. Martin's correspondence, even a quick review reveals that his charges are at best suppositions and are consistently mere allegations without any supporting documentations whatsoever. For example, Mr. Martin repeatedly asserts the plan currently being pursued

Ronald D. Collins  
Vice President  
District 2

by the EOWV will not benefit the people of West Virginia<sup>1</sup> nor will the expenditure of the funds at issue create jobs<sup>2</sup>. Not only are Mr. Martin's assertions not supported by facts provided in his correspondence, they are also inconsistent with the facts on the ground in West Virginia. Let me be clear, Frontier in West Virginia has committed to hire additional workers in this state and I can assure you that if Frontier does not live-up to its commitments regarding jobs CWA will make every effort to ensure that it does. I would also note, that unlike Mr. Martin's assertions, the economic projects noted the EOWV's Application are based upon U.S. Department of Commerce data (See Application, page 8<sup>3</sup>) and not on un substantiated suppositions.

Over the past several years, CWA has been privileged to have a representative on the West Virginia Broadband Development Council. From the vantage point, Ms. Elaine Harris of CWA, has had a unique view of the needs of West Virginia with regard to broadband and the EOWV's reaction to those needs - including the filing and implementation of the NTIA's award to West Virginia. Having participated in the Council throughout this process, CWA supports the current implementation of the NTIA's award in West Virginia as it stands at this point in time and will continue to work to ensure that the future of broadband in West Virginia will be positive of this State and its people.

In closing, I will not speculate on the motivation for Mr. Martin's correspondence, nor for his personal attacks on West Virginia Commerce Secretary Goes.<sup>4</sup> I will say that it is my experience that many times those without the support of facts resort to unsubstantiated allegations and personal attacks. Mr. Martin's recent actions are entirely consistent with that lesson.

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<sup>1</sup> See Martin letter page 2, paragraph 2, wherein Mr. Martin asserts that benefit to West Virginia set out in the Executive Summary of the EOWV's Application are "false".

<sup>2</sup> See Martin letter page 4 "Certainly no jobs will be created as a result of paying \$40 million to Frontier."

<sup>3</sup> "The jobs created by this request are easily quantified. Extrapolating from U.S. Department of Commerce data, CWA estimates an employment multiplier effect of 19.5 jobs in the telecommunications and information technology (IT) for every \$1 million invested. Secondly, the economic development benefits are well documented and the impact on this rural state will be profound and immediate. According to a Brookings study, as detailed in a February 2008 report by Connected Nation, for every 1% increase in broadband penetration, employment is projected to increase by 0.2 to 0.3%. The U.S. Department of Commerce also determined that communities with broadband not only increase the employment rate by 1%, but added 0.5% to the growth of business establishments and 0.5% to the share of IT establishments."

<sup>4</sup> See email of 9/13/10 from Mr. Martin to the Members of the West Virginia Broadband Council.

Thank you for considering this response. If you have any questions or concerns please feel free to contact me. In closing, I urge you to continue to work with the EOWV to fully implement the NTIA's award and to quickly complete any review of Mr. Martin's assertions in a manner that permits the continued investment in broadband that this State so desperately needs.

Sincerely,

A handwritten signature in black ink, appearing to read "Ronald Collins". The signature is fluid and cursive, with the first name "Ronald" written in a larger, more prominent script than the last name "Collins".

Ronald D. Collins  
Vice President

cc: Governor Manchin  
Senator Rockefeller  
Senator Goodwin  
Congressman Capito  
Congressman Mollohan  
Congressman Rahall  
Secretary Kelly Goes ✓  
Michael Fletcher, WV PSC  
Byron Harris, WV PSC Consumer Advocate  
Jerry Berman, Center for Democracy & Technology