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March 24, 2014

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

RE: DOCKET NO. T012020155  
IN THE MATTER OF VERIZON NEW JERSEY, INC.'S ALLEDGED FAILURE  
TO COMPLY WITH OPPORTUNITY NEW JERSEY COMMITMENTS

Dear Ms. Izzo:

New Jersey Farm Bureau represents 11,000 members across the state of New Jersey. Our members are located in many rural communities that are the foundation of the agriculture industry and are often a valuable economic support to those communities. Our organization's goal is to support the \$1.1 billion dollar agriculture industry and make sure it has the resources to operate in a technology-driven business climate. We are aware that some of our southern counties, specifically Cumberland and Salem, have been directly engaged in trying to rectify this above-noted issue and we fully support the counties in their concerns with attaining broadband services. We are informed that there have been some improvements made in parts of Cumberland County with the installation of Fios to two towns, although this does not address the other towns that do not have access to broadband service.

Understandably, several rural areas throughout South Jersey remain cut off from the enabling technologies necessary for business growth at a time when economic growth is urgently needed. The dynamics of NJ agriculture is changing so rapidly with technological advancements that farms are becoming more reliant on internet access every day. This need for efficient, reliable internet and phone service has compelled the New Jersey Farm Bureau to oppose the stipulation of settlement agreement between Verizon and NJBPU. Since agriculture has become more reliant on the internet to market its agriculture products via website and social media, rural agriculture areas deserve the same services that are offered to commercial businesses in urban areas. Reality is such that a farm cannot simply relocate to an area that offers better telecommunications services. New Jersey Farm Bureau questions Verizon's claim that all rural areas are served via hard-line or wireless 4G. We are informed by our members that this is not so.

Specific concerns and reasons for opposition are as follows:

1. The Broadband Request Process is one that relies on flawed 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 some of 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 for current operation let alone the growing data demands of precision agriculture, a management practice that improves soil inputs, meets environmental constraints, and increased profitability. In addition to being inadequate, data cap pricing and/or limits make cellular and or satellite solution more expensive. Precision agriculture calls for robust telecommunications infrastructure, i.e., “fiber to the farm, wireless to the tractor.” We implore the BPU to hold Verizon to a higher standard, both in terms of the access medium and in the definition of broadband.
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, because a farmer cannot relocate his/her land to where the infrastructure exists; the infrastructure must come to the farmer.
4. Communities successful in the preservation of farmland and open space are penalized for being good stewards of the land. Because these communities will never have the population densities to cost-justify telecommunications build out, there must 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 without sufficient Broadband services.

For these reasons, New Jersey Farm Bureau urges the NJ Board of Public Utilities to withhold approval of this proposed agreement and require Verizon NJ to fully meet its obligations under Opportunity NJ. NJ Farm Bureau believes that careful review of the current service provided to the rural areas of NJ will shed light on the inadequacies that exist with broadband service required to be supplied to New Jersey.

Sincerely,



Ryck Suydam, New Jersey Farm Bureau President

cc: Governor Chris Christie  
State Senator Jeff Van Drew- District 1  
Assemblyman Sgt. Bob Andrzejczak- District 1  
Assemblyman Sam Fiocchi – District 1  
Senate President Stephen Sweeney- District 3  
Assemblyman John Burzichelli- District 3  
Assemblywoman Celeste Riley – District 3  
Secretary of Agriculture Doug Fisher  
Ed Purcell, Esq., NJ League of Municipalities