



March 19, 2021

Executive Office of the President  
Office of Management and Budget  
1600 Pennsylvania Avenue  
Washington, DC 20500

**RE: Recommendation From the Metropolitan and  
Micropolitan Statistical Area Standards Review  
Committee to the Office of Management and Budget  
Concerning Changes to the 2010 Standards for  
Delineating Metropolitan and Micropolitan Statistical Areas  
86 Fed. Reg. 5263**

***Submitted Electronically***

To the Director:

NTCA-The Rural Broadband Association (NTCA) hereby submits comments in the above-captioned matter. In the instant proceeding, the Office of Management and Budget (OMB) proposes to increase the minimum urban population to qualify as a metropolitan statistical area (MSA) from 50,000 to 100,000. As explained below, this amendment could affect regulatory and policy perceptions of how “rural” is defined. The potential impacts of this proposed revision on various Federal programs do not appear to have been enumerated or quantified. Accordingly, NTCA recommends the OMB to defer its final decision on this proposal until such time as OMB, working with other Federal offices, provides interested parties and industries with a projected impact statement that can inform reasoned commentary on the proposal.

By way of introduction, NTCA represents nearly 850 independent, community-based telecommunications companies and cooperatives and more than 400 other firms that support the provision of communications in the most rural portions of the United States. NTCA members serve fewer than 5% of the U.S. population, yet their collective service territories cover 37% of the U.S. landmass. NTCA members offer a suite of cutting-edge communications services, including broadband, voice, and video, and their networks enable economic development, education, health care and other vital services in their respective communities. NTCA members rely upon many programs administered by the Federal offices that are aimed at ensuring the provision of advanced communications services to rural spaces.

As the OMB is aware, “rural” is not a consistently defined term even among Federal offices. While OMB has noted that its MSA-based classifications “do not equate to an urban-rural classification,”<sup>1</sup> the current 50,000 population threshold comports with U.S. Census Bureau

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<sup>1</sup> United States Office of Management and Budget, Bulletin No. 13-01, “Revised Delineations of Metropolitan Statistical Areas, Micropolitan Statistical Areas, and Combined Statistical Areas, and Guidance on Uses of the

definition of “rural” as any area that is not “urban,” namely, an urban area as one with (a) an “urbanized area” with at least 50,000 people, or (b) an “urban cluster of at least 2,500 and fewer than 50,000 people.”<sup>2</sup> Accordingly, the OMB classifications appear to be reported out in a manner that invites even rough comparisons to the rural/urban issue. These tendencies may well invite policymakers and Federal agencies to revise their own programmatic definitions in a way that could invite adverse impacts to rural spaces.

Federal policies promulgated by agencies including the Federal Communications Commission and the Department of Agriculture have enabled significant strides forward to bring advanced communications services to rural and insular regions of our Nation. These, in turn, have enabled increased rural participation in broadband-enabled economic development, education and health care, strengthening rural spaces and in turn supporting rural and urban interdependencies that accrue benefits to the entire unified Nation. The effective expansion of “rural” to include spaces with populations of 100,000 people could risk diffusing, and thereby diluting, attention to critical rural issues including broadband infrastructure and industries that rely upon and thrive from it: rural economic development, education, health care and other vital services. Observers considering the “state of rural” could be lulled into regulatory complacency by equating conditions in a thriving metropolitan area with a small town in Appalachia, a village in Nebraska, or a hamlet in Ohio. The effective inclusion of large cities and their immediately surrounding environs in “rural” could deceive policymakers by advancing the impression that favorable conditions in those large areas is representative of conditions in smaller areas which, in actuality, are more challenging.

At this time, NTCA recommends the OMB to suspend implementation of the definitional change until the potential impact of that change on various telecommunications and other Federal programming can be assessed and measured. The perceived benefits of redefining MSAs could be outweighed by unintended, albeit damaging, impacts that may accrue if future programming needs for rural communities are allowed to wither under the misimpression that conditions in large areas reflect conditions in more rural and insular spaces .

Respectfully submitted,

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Delineations of These Areas,” at 3 (Feb. 28, 2013)

(<https://www.whitehouse.gov/sites/default/files/omb/bulletins/2013/b-13-01.pdf>) (last viewed Oct. 7, 2015, 17:18) (OMB Bulletin).

<sup>2</sup> United States Census Bureau website, “Urban and Rural Classification”

(<https://www.census.gov/geo/reference/urban-rural.html>) (last viewed Oct. 7, 2015, 17:41) (Census Bureau).