

19 December 2011

The Honorable Julius Genachowski
Chairman, Federal Communications Commission
The Honorable Commissioners Michael Copps, Robert McDowell, and Mignon Clyburn
445 12th Street, SW
Washington, DC 20554

Dear Mr. Chairman and Commissioners:

IEEE-USA would like to congratulate the Commission (FCC), other agencies, and industry for the substantial progress achieved toward meeting the goal of ubiquitous broadband deployment.

We urge continued efforts to achieve the unmet objectives and to keep pace as broadband technology develops even further. Expanding applications, such as convergence of data, voice, and video into digital bit streams, mobile communications, social networking, and cloud computing are creating explosive demand.

The 2009 IEEE-USA position statement, *Nationwide High-Speed Broadband Data Service* (<http://www.ieeeusa.org/policy/positions/broadband.pdf>), urged the U.S. government and the U.S. communications industry to work together to provide nationwide and ubiquitous access to affordable high-speed broadband data services and to facilitate use of new and demanding Internet applications.

We would like to highlight the substantial national progress in the context of our January 2009 recommendations, and to focus on the important objectives yet to be realized.

- **Designate universal and affordable access to high-speed broadband networks as a national priority and establish a series of bandwidth goals and target dates for deployment.**
President Obama has shown vision and leadership by promoting broadband as a priority, but no formal designation has occurred. Nevertheless, broadband's priority should remain high on the national agenda. One reason is that the competitive advantage of the United States suffers because we are not among the top countries in penetration, speeds, and prices.

The FCC issued its National Broadband Plan on March 11, 2011. The Plan seeks near-ubiquitous availability and covers most of the points in our statement. The Plan sets one of its goals as 100 Mb/s download to 100 million homes by 2020. With this encouragement, the market may, itself, provide 100/Mb/s if there is domestic demand.

- **Provide economic incentives for broadband investments and uses that qualify as furthering our national objectives.**
The American Recovery and Reinvestment Act (Stimulus Bill) in 2009 provided \$8 billion for broadband, including some funds for digital literacy. Both Congress and the FCC are pushing for better spectrum management and new availability of 500 MHz by 2020 to support mobile commerce. For example, work progresses on adequate and interoperable systems for first responders.

The FCC's Connect America Fund Report and Order (FCC 11-161, October 27, 2011), proposes to reform the Universal Service Fund to support fixed and mobile broadband. These technologies, incidentally, are becoming more and more integrated. However, the Commission should strike a careful balance between supporting legacy uses and enabling future innovations. The challenge will be to give enough support to innovative technologies to keep our networks and companies competitive with those of other countries while still providing older, but needed, services and applications.

- **Foster further competition in facilities, service provision and content through legislation and regulation.** The "no blocking" provision of the FCC's Report and Order, Preserving the Open Internet (FCC 10-201, December 23, 2010), takes a welcome step toward network neutrality and toward competitive content. Still, the Order imposes no requirement for facilities providers to open their networks to all comers, as Europe does. The 2010 IEEE-USA position statement, *Network Traffic Management* (<http://www.ieeeusa.org/policy/positions/NetworkTrafficManagementNov10.pdf>), advocates such openness. Such a requirement should still be considered even though U.S. ideology believes it unnecessary as long as there are competitive facilities providers.

There is still no federal move to rescind all legislative and regulatory restrictions on deployment of end-user owned wired and wireless networks by municipalities and other communities, wherever these provide capability in the absence of adequate, cost-effective, or timely commercial services. Congress should ultimately remove such restrictions, in spite of the fact that such networks are not emerging fast even where they are unrestricted.

The FCC issued its report, Measuring Broadband America: A Report of Consumer Wireline Broadband Performance in the U.S. (August 2, 2011). The report will likely stimulate the competitive marketplace by publishing performance metrics for consumer choice.

To summarize developments since the 2009 IEEE-USA position statement:

- Government and industry have recognized the capabilities and benefits of widespread, advanced broadband networks.
- National policies and leadership have resulted in important initiatives by both sectors.
- Yet, intensified effort remains necessary--both to open a new era of innovation for knowledge-based goods and services in our domestic economy and to attain and sustain U.S. technological and competitive advantage globally.

IEEE-USA will develop position statements on further broadband issues as they emerge in an effort to make its views known to the Commission.

IEEE-USA advances the public good and promotes the careers and public policy interests of 210,000 engineering, computing and technology professionals who are U.S. members of IEEE. <http://www.ieeeusa.org>. If we can be of further assistance, please contact Deborah Rudolph in our Washington office at (202) 530-8332 or email at d.rudolph@ieee.org.

Sincerely,



Ronald G. Jensen
IEEE-USA President

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