Mr. Chairman,

I am opposed to lowering the FCC standard for broadband internet access so that mobile internet counts as broadband.

According to Telecompetitor.com (http://www.telecompetitor.com/igr-average-monthly-broadband-usage-is-190-gigabytes-monthly-per-household/), the average home uses about 190 gigabytes of data each month. Considering that the **BEST** mobile data plans top out at 50 gigabytes a month, the average home uses nearly four times as much data as allowed for on a mobile only plan. Further, that same site notes that 80% of that data use is video. There is no way that a home could rely on a mobile only plan to stream that much video and have a reliable, useable connection relying only on mobile data.

Every mobile data plan either seriously throttle access – to the point where the internet is unusable – or “de-prioritized” on the congested tower to the point where data is unusable. Right now, this tends to only happen away from home. Once every American is reliant on a mobile broadband connection, this will happen at home as well as away from home. This is because, as people return to the their neighborhoods, they will cause congestion on those towers and people who’ve exceeded their monthly allotment of data will be unable to access the internet in a useful way.

For a family that uses 6-8 gigabytes of data a day, they will blow through their mobile data cap in about 5 ½ days. And that is assuming that family is paying for a “unlimited” data plan. For those that can’t afford those expensive post-paid “unlimited” data plans, they will hit their cap even sooner.

Now, granted, if you goal is to be able to say that all Americans now have access to broadband by lowering the standard, you will succeed. However, even the ISPs say that for a family to stream video, they need about 10 megabytes of data per family member. Consumer Reports recommends at least 8M down to steam 1080p video and at least 18M down for 4K video. Considering how popular services like Netflix and Hulu are, mobile broadband is not going to allow much streaming at those resolutions before hitting the data cap. 360p video may look okay on a 6 inch telephone screen, but it won’t scale very well to even a 32 inch high definition TV.

This is a poorly thought out sop to the telecom providers who don’t want to expand their networks and also don’t want to compete with municipal broadband. If facts matter, this is a bad idea all around.