



Before the
Federal Communications Commission
Washington, D.C.

September 10, 2018

In the Matter of
Inquiry Concerning Deployment of Advanced
Telecommunications Capability to All Americans
In a Reasonable and Timely Fashion

GN Docket No. 18-238

The Power & Communication Contractors Association (PCCA) represents construction contractors, manufacturers, and suppliers that build and repair America's power and communications infrastructure, including broadband, electric transmission, distribution, and substation facilities, telephone, and cable television systems. PCCA members provide the manpower and expertise needed to install the infrastructure for significant broadband deployment across America and also engage in directional drilling, local area, and premises wiring. PCCA appreciates the opportunity to comment on the Notice of Inquiry (NOI) issued by the Federal Communications Commission (FCC) asking for feedback on FCC's next annual evaluation of the "availability of advanced telecommunications capability to all Americans in a reasonable and timely fashion."

The *2018 Broadband Deployment Report* indicated "that advanced telecommunications capability was being deployed to all Americans in a reasonable and timely fashion" and the current speed benchmark of 25 Mbps/3Mbps was "the appropriate measure to assess whether fixed services provides advanced telecommunications capability." In the latest NOI, FCC proposes to maintain the 25/3 Mbps benchmark.

Representing approximately 85 percent of the entities doing the construction work needed to deploy broadband across America, including rural areas, PCCA members bring a unique perspective to these issues coming from those doing the work in the field. Respectfully, continuing to recognize 25/3 Mbps as targeted speeds sets the bar too low. Consumer demand for faster upstream and downstream speeds

already indicates that these speeds are obsolete. Pursuing “future proof” speeds of 100/100 Mbps would allow for technological advancements and meet demand for the simultaneous use of multiple mobile devices in businesses, schools, hospitals, first responders, and American homes today and into the future.

PCCA agrees with statements made by Commissioner Rosenworcel, who said “it is time to be bold and move the national broadband standard from 25 Megabits to 100 Megabits per second.” FCC policy should focus on encouraging construction of fiber-based infrastructure and avoid repairing antiquated copper systems and becoming mired with bureaucratic hurdles that continue to obstruct effective broadband deployment. Setting target speeds of 100/100 Mbps will provide an appropriate goal for meeting current and future demands for effective broadband service in Rural America.

Need for Appropriate Oversight

The vast majority of broadband projects are contracted out, and the PCCA membership represents the vast majority of those doing this important work. Unfortunately, PCCA members have experienced multiple situations where certain carriers have expended minimum resources to improve existing copper networks only enough to meet a percentage of needed speeds within a census block to be eligible for federal funding. This leaves many residents and businesses with inadequate levels of service. While PCCA believes in the free market and reducing regulatory burdens, increased oversight is needed to ensure that upgrades and new infrastructure built with federal resources have the capacity to provide required broadband speeds.

Effective oversight begins with providing accurate measurements of broadband service. The current process of self-reporting by carriers as to broadband coverage and speeds through use of FCC form 477 may not be sufficient as the sole source of measurement. While reporting is based on census blocks, providers do not necessarily offer service to every home in every block in which they report and sometimes overestimate broadband coverage. Calculations used to create graphs and maps treat every location as having service, which is not the most effective barometer to ensure that carriers are meeting their obligations as recipients of federal funds. A variety of speed test measurements are readily available and can effectively determine if connections are meeting the required benchmark speeds.

Fiber optic has become the material of choice in broadband deployment for good reason, offering significantly faster speeds over much longer distances than traditional copper technologies. The biggest obstacle of widespread adoption of fiber-based broadband is the cost of implementing new fiber lines when old systems are still able to serve customers. In order to gauge real “progress,” FCC should ensure that federal resources are used to their maximum benefit, namely by updating antiquated copper systems with contemporary fiber networks. Confirming the goal of higher broadband speeds will allow for market-based approaches to future-proof broadband infrastructure.

High-speed internet is no longer a convenience; communities across America are clamoring for faster and more reliable broadband service not because they enjoy it, but because they *need* it. PCCA appreciates the opportunity to comment on this NOI, and we are available to answer any questions.