**Before the**

**Federal Communications Commission**

**Washington, D.C. 20554**

In the Matter of )

Inquiry Concerning Deployment of Advanced )

Telecommunications Capability to All Americans ) GN Docket No. 17-199

in a Reasonable and Timely Fashion )

**COMMENTS OF**

**BENTON FOUNDATION**

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The Benton Foundation (Benton) hereby submits the following comments in the above-captioned proceeding. Benton works to ensure that media and telecommunications serve the public interest and enhance our democracy. Benton curates and distributes the only free, reliable, and non-partisan daily digest of media and communications news. Benton connects stakeholders through information sharing and analysis to frame and promote conversation and a more inclusive debate around communications policy. Benton supports legal and policy experts who preserve and strengthen the public benefits of America’s communications environment, who can nourish and protect democratic values, and who can communicate to the public why this all matters. Benton has long advocated for universal, affordable telecommunications access for everyone living in the United States.

In this proceeding, the Commission seeks evidence reflecting the state of broadband deployment and availability as it strives “to encourage the deployment of broadband to all Americans in a reasonable and timely fashion.” Drawing from articles and other works Benton has compiled for its communications news digest over the past year, we are certain that broadband is definitively not being deployed to all Americans in a reasonable and timely fashion.

On October 14, 2016, the Center for Public Integrity reported[[1]](#footnote-1) that the largest noncable internet providers collectively offer faster speeds to about 40 percent of the population they serve nationwide in wealthy areas compared with just 22 percent of the population in poor areas. That leaves tens of millions of Americans with the choice of either purchasing an expensive connection from the only provider in their area, typically a cable company, or just doing the best they can with slower speeds. Middle-income areas do not fare much better, with a bit more than 27 percent of the population having access to a DSL provider’s fastest speeds.

Reporting on broadband access in a number of urban areas confirms the Center for Public Integrity’s findings:

* The Commission need not travel far to collect evidence to disparities in broadband deployment: Washington (DC) has a wide disparity of available broadband speeds.[[2]](#footnote-2)
* Even though 70 percent of the world’s internet traffic passes through Loudoun County, Virginia, an estimated 30,000 people in western portions of the county are under-served or un-served when it comes to Internet access.[[3]](#footnote-3)
* AT&T failed to upgrade its network in low-income neighborhoods, including most of the City of Dayton, while deploying a high-speed fiber-based network in wealthier suburban areas.[[4]](#footnote-4)
* Internet download speeds are glacial in Cleveland neighborhoods like Glenville, where AT&T did not roll out its U-Verse service.[[5]](#footnote-5) The company is accused of "digital redlining," specifically of leaving the poorest neighborhoods out of its infrastructure improvements in cities like Cleveland, Toledo, Dayton, Louisville, Detroit and Milwaukee.
* In California, AT&T’s deployment of “gigapower” all-fiber service is concentrated in wealthier communities, relegating lower-income neighborhoods to less advanced technologies that offer markedly slower speeds.[[6]](#footnote-6)

Unfortunately, income levels alone do not explain gaps in broadband deployment. Free Press[[7]](#footnote-7) finds that there are differences in broadband deployment that perpetuate digital divides based solely on race and ethnicity:

* Chronically underserved racial and ethnic communities – in both urban and rural areas – have inferior internet-access options compared to those that Whites have.
* Areas with a higher proportion of people of color have fewer wired internet service providers and are more likely to be completely unserved or live in a or monopoly area.
* Higher-income areas have more and better broadband options, but the income gap does not fully explain the observed racial/ethnic broadband-deployment gap in rural areas.

In many rural communities, broadband lags behind in both speed and available connections.[[8]](#footnote-8) Some rural consumers pay $170 a month for a satellite internet service too slow to upload photos, much less conduct business. In many rural communities, where available broadband speed and capacity barely surpass old-fashioned dial-up connections, residents sacrifice not only their online pastimes but also chances at a better living. In a generation, the travails of small-town America have overtaken the ills of the city, and this technology disconnect is both a cause and a symptom. Counties without modern internet connections cannot attract new firms, and their isolation discourages the enterprises they have: ranchers who want to buy and sell cattle in online auctions or farmers who could use the internet to monitor crops. Reliance on broadband includes any business that uses high-speed data transmission, spanning banks to insurance firms to factories. Many rural areas in the U.S are still waiting for broadband service:

* So much of Blacksburg is made up of Virginia Tech. But drive 15 minutes in any direction and this emerging tech hub of a town gives way to rural, rolling plains of farmland. That geographic divide also marks a digital wall between internet haves and have-nots — one fiercely felt along the 40-mile stretch between Blacksburg and Roanoke, a city of 100,000-plus people whose broadband speeds are slower than those found in the capital of Latvia.[[9]](#footnote-9)
* Thirty-eight percent of people in rural Erie County (PA) don’t have access to fixed broadband. The DVD movie rental business might benefit from lack of broadband, but it’s hurting many others.[[10]](#footnote-10)
* In Goliad County (TX) a provider recently triumphantly told a customer that it had upgraded service to 12MB per second. Prior to that, the customer was paying for 5MB. In practice, most of the time the customer was lucky to get 2MB per second.[[11]](#footnote-11)
* Saguache County (CO) may have the worst broadband in the U.S., according to FiveThirtyEight.[[12]](#footnote-12)

Stories like these led 56 US senators,[[13]](#footnote-13) in April 11, 2017, to encourage FCC Commissioners to “continue working to advance broadband deployment in high-cost rural areas to give rural Americans the opportunity to obtain affordable broadband.” (Similar, bipartisan letters were also sent in May 2014 and May 2015.)

Benton, too, encourages the Commission to continue working to ensure that all areas of the U.S. have fast, robust, affordable broadband available for all residents and businesses. Anything short of truly universal broadband means that the country continues to fall short of Congress’ mandate.

Respectfully Submitted,

Filed by:

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