



Comcast Corporation
300 New Jersey Avenue, NW
Suite 700
Washington, DC 20001

December 4, 2018

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, D.C. 20554

Re: Letter Regarding the Communications Marketplace Report,
GN Docket No. 18-231

Dear Ms. Dortch:

On November 21, 2018, the Commission released a draft of the Communications Marketplace Report, which is required by Title IV of RAY BAUM'S Act of 2018.¹ In the Commission's Assessment of Competition and Deployment in the Mobile Wireless Market, the Report cites to a statistic provided by Pew Research Center ("Pew") regarding the number of American adults who are "smartphone-only" Internet users.²

Comcast believes that it would be valuable to also include a statistic from the U.S. Census Bureau's American Community Survey ("ACS") that provides the number of *households* that rely only on smartphones or other mobile devices for access to the Internet.³ The 2017 ACS,

¹ *Communications Marketplace Report*, Report, GN Docket No. 18-231, (Nov. 21, 2018) (released for tentative consideration at the Commission's December 2018 Open Meeting) ("Report") (citing Repack Airwaves Yielding Better Access for Users of Modern Services Act of 2018, Pub. L. No. 115-141, 132 Stat. 1087 (codified at 47 U.S.C. § 163) ("RAY BAUM'S Act")).

² See Report at ¶13. The Pew statistic is based on a survey of 2,002 adults, conducted in January 2018. See Aaron Smith and Kenneth Olmstead, *Declining Majority of Online Adults Say the Internet Has Been Good for Society*, PEW RESEARCH CENTER (Apr. 30, 2018) at 7, http://www.pewinternet.org/wp-content/uploads/sites/9/2018/04/PI_2018.04.30_Internet-Good-Bad_FINAL.pdf.

³ *2017 American Community Survey 1-Year Estimates, Types of Computers and Internet Subscriptions*, U.S. CENSUS BUREAU (2017), https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_17_1YR_S2801&prodType=table ("2017 ACS"). The 2017 ACS is based on an annual sample of 2.1

which uses a rigorous methodology, and covers roughly the same time period as the Pew study, found that 11% percent of U.S. households subscribe to a cellular data plan with no other type of Internet subscription.⁴ Comcast believes including this relevant statistic about households would make the Report more complete.

Further, the same section of the Report also offers a statistic on wireless-only telephone service from a U.S. government source, the Centers for Disease Control and Prevention.⁵ Comcast believes that the addition of the 2017 ACS statistic in this section allows the Commission to avail itself of the expertise of another Federal entity, and offers a relevant and important data point to the discussion.

Respectfully submitted,

/s/ Beth Choroser

Beth Choroser

Vice President

Regulatory Affairs

T: (202) 379-7141

E: Beth_Choroser@Comcast.com

cc: Rachael Bender
Preston Wise

million U.S. housing units. *See American Community Survey - Sample Size*, U.S. CENSUS BUREAU (2017), <https://www.census.gov/acs/www/methodology/sample-size-and-data-quality/sample-size/>.

⁴ *See* 2017 ACS.

⁵ *See* Report at ¶13.