

November 20, 2015

The Honorable Thomas Wheeler
Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Dear Chairman Wheeler:

The BlueGreen Alliance (BGA) unites America's largest and most influential labor unions and environmental organizations. BGA encourages the Federal Communications Commission to continue its efforts and commitment to move our country to advanced communications networks, which includes modern Internet Protocol (IP) networks that are needed if we are to build the 21st century infrastructure systems to meet rapidly growing economic demands. Getting this transition right is vital for America to move quickly to adopt modern infrastructure and to do so in a way that addresses climate change, creates and retains jobs, and protects communities. At the same time, the FCC must ensure that the core values of universal service, consumer protection, and public safety are protected during this transition.

As a leading voice in the fight to protect our environment, the BlueGreen Alliance would also like to emphasize the potential environmental benefits of FCC action. Today the information and communications technology industry accounts for 3% of the U.S.'s total emissions (an estimated 204 million metric tons of carbon dioxide equivalent per year).

Notably, advanced communications networks could reduce energy consumption by 8.4 billion kilowatt hours. Transitioning to IP would also require approximately 70% less water for cooling equipment. That equates to 16.8 billion gallons of water a year, or two times the amount of bottled water consumed in the US each year.

In addition, upgrading communications infrastructure is important to enable the growth of the Internet of Things (IoT). By 2020, environmentally-friendly IoT-enabled machine-to-machine (M2M) technologies could help reduce global greenhouse gas emissions by 9.1 billion metric tons, the equivalent to 18.6% of global emissions, by reducing the energy and fuel required to perform tasks.

Lastly, upgrading communications infrastructure to systems such as IP has an important impact on the frontline of workers who build, maintain, and service communications networks. The Commission should have a direct interest in making sure that telecommunications carriers build on existing investments in a skilled workforce. Any rules the Commission adopts should encourage dynamic technological change and continued investment.

The BlueGreen Alliance concurs with the FCC's goal of promoting a transition to 21st century technologies, including IP, while protecting consumers, reliability, and safety. We urge you to encourage this transition, because every day we wait is another day we pass up the opportunity to rebuild our nation's infrastructure and take on the historic challenge of climate change.

Sincerely,

Lee Anderson
Director of Legislation and Policy
BlueGreen Alliance