

Friends at the FCC;

High speed information access is an important -perhaps essential- driver of the US economy and business competitiveness. It's essential to my employment, and very important to me as a consumer.

In my opinion, the slow rate of deployment and high prices for broadband in the US (relative to Japan, Canada, Korea, and the UK) is a threat to US businesses and education's ability to compete in the world market. Prices for high speed information access in the US are as much as 50 % more than in Japan and Canada. Why is this??

Information access is a key enabler for economic growth, education (and quality of life) today. Lack of it is a real threat. I suggest that we (the US) think Sputnik - and craft an appropriate policy in response. Please consider creating a policy that makes affordable high speed information access a high national priority.

Please consider defining a broadband policy that:

1) Establishes equal requirements for all providers of internet access, and "information services" equally (cable MSOs, wireline RBOCs, satellite, wireless, etc.)

2) Requires competitive access (unbundling), but

a) Clarifies that competitive access is required only to central offices, aggregation points, or provider network interface (NNI) points in provider networks. Direct access to remote deployments and "outside plant" should not be required.

b) Sets realistic wholesale prices - \$ 33 is way too high for wholesale access. Worldwide examples show that \$ 20 (US) for wholesale access is realistic and profitable for providers.

3) Provides incentives for deployment.

I suggest that incentives be tied to speed and ubiquity of the service provided.

(The MINIMUM starting point for high speed is relative, and I suggest that services and speeds qualifying for incentives should be re-evaluated periodically - perhaps every 3 years. As a compromise, I suggest starting with a minimum of 384 Kbps downstream today, 1.5 Mbps in 2005, and 10 Mbps in 2010. Remember, this is only a minimum speed to qualify for incentives. Higher speeds/richer services should be encouraged, and any obstacles - such as the results or interpretation of Computer Inquiry 2 - removed or clarified.)

4) Requires and enforces truth in advertising (esp. regarding speeds). Quality and reliability are essential - provide a court of recourse for poor service, and false or misleading advertising.

Penalties for violation must be in proportion to the size of the business for the providers in order to be effective. If millions (or billions) are at stake for providers, any penalties must be in the same range.

thanks for listening,  
Gregg Zupcsics