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**Via ECFS**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, and Possible Steps To Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act of 1996, GN Docket No. 07-45**

Dear Ms. Dortch:

In Verizon's comments and reply comments in the above-referenced proceeding, Verizon suggested (on pages 32 and 15, respectively) that the Commission began collecting data regarding high-speed lines by information transfer rates starting with the June 2006 reporting period. The Commission first began collecting such data with the June 2005 reporting period. Corrected versions of the relevant pages are attached.

Thank you for your assistance in this matter. If you have any questions, please call me at 202-515-2529.

Very truly yours,

A handwritten signature in black ink that reads "Dee May".

Attachments

correctly observes that the broadband market has evolved considerably since it first adopted this threshold, *see id.*, that evolution – which is still ongoing – highlights the need for the Commission to take a flexible approach, rather than choose an arbitrary threshold. For purposes of data gathering, the Commission should collect information about different speeds of broadband services, including those capable of 200 kbps or higher, as well as services at much higher speeds. There is no reason to stop tracking entry-level broadband speeds that continue to provide many consumers access to the applications and services they desire.

Until recently, the Commission reported data on all broadband lines above 200 kbps in the aggregate. Beginning with the June 2005 reporting period, however, the Commission began reporting downstream speeds on a more granular basis, grouping broadband lines into those with maximum downstream speeds of less than 2.5, 10, 25, or 100 Mbps. Despite changes in the marketplace, it still makes sense to use 200 kbps as the entry-level speed for data-reporting purposes, since most common broadband applications – such as basic web-surfing and e-mail – can be performed adequately at this speed. In fact, some new broadband technologies that are being deployed – such as municipal WiFi networks – are designed to provide average throughput of approximately 200 kbps.<sup>97</sup> And services offering speeds on the low end of the broadband

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<sup>97</sup> See, e.g., *Amended Wireless Broadband Internet Access Network Agreement between the City and County of San Francisco and EarthLink, Inc.* § 11.1.5.1 (amended Apr. 19, 2007), [http://www.sfgov.org/site/uploadedfiles/dtis/tech\\_connect/process/FinalAmendedNetworkAgreement.pdf](http://www.sfgov.org/site/uploadedfiles/dtis/tech_connect/process/FinalAmendedNetworkAgreement.pdf) (Basic Service in San Francisco will be available at a minimum average symmetric throughput of 300 kbps); CenturyTel, *Vail WiFi*, [https://www.vailwi-fi.com/?view=splash;client\\_ip=66.208.26.115;portal=centurytel;filtered=yes](https://www.vailwi-fi.com/?view=splash;client_ip=66.208.26.115;portal=centurytel;filtered=yes) (in Vail, Colo., one hour of service is available at no cost every 24 hours, for speeds up to 300 kbps); Azulstar, *Azulstar Wi-Fi Internet and Wi-Fi VoIP Pricing*, <http://www.ottawawireless.net/services/pricing.html>; Azulstar Networks, *Azulstar Networks Coverage*, <http://www.azulstar.com/coverage-map.html> (in Grand Haven, Rio Rancho, Spring Lake, and Ferrysburg, Mich., one hour of service is available at no cost every 24 hours, for 256 kbps downstream/60 kbps upstream service).

broken and strained USF system. While the Commission may wish to investigate tax incentives or other programs to help deliver broadband to those most in need, it is critical that such programs are competitively neutral and do not burden the provision of broadband to other consumers.

**III. THERE IS BROAD CONSENSUS THAT THE COMMISSION SHOULD COLLECT DATA ON A WIDE RANGE OF BROADBAND SPEEDS RATHER THAN ADOPT AN ARBITRARY THRESHOLD**

Verizon explained in its comments that, because the broadband marketplace is continually evolving, the Commission should take a flexible approach to defining broadband, rather than choose an arbitrary threshold. Verizon further explained that the Commission should continue to collect data regarding entry-level broadband speeds (200 kbps or higher) because such speeds are still sufficient for many popular applications (such as web-surfing and e-mail), but that the Commission should also continue its practice – started with the June 2005 reporting process – of collecting data for different categories of higher-speed services. Verizon also recommended that the Commission add one additional reporting category for speeds above 200 kbps but less than 700 kbps, which would allow the Commission to better understand the prevalence of services on the lower end of the broadband scale, and to distinguish those from faster services that enable a broader range of services and applications.<sup>18</sup>

There is a broad consensus among the comments for the Commission to take a flexible approach to collecting broadband data that is generally consistent with the

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<sup>18</sup> Although average broadband speeds have been increasing – driven by competition and consumer demand for bandwidth-intensive applications – maintaining the existing reporting categories will provide a more accurate historical perspective of the progress that has been made than arbitrarily changing the reporting framework.