Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
A National Broadband Plan for Our Future	)	GN Docket No. 09-51
	)	
	)	

COMMENTS OF GENERAL COMMUNICATION, INC.

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Introduction and Summary

General Communication, Inc. ("GCI") agrees with the Federal Communications Commission ("FCC" or "Commission") on the significance of this proceeding to the country and its future success. As the Commission notes, "[h]ighspeed ubiquitous broadband can help to restore America's economic well-being and open the doors of opportunity for more Americans, no matter who they are, where they live, or the particular circumstances of their lives. It is technology that intersects with just about every great challenge facing our nation."[1]

Nowhere is this truer than in Alaska, GCI's home State. Alaska's vast distances, widely dispersed population, severe climate, and difficult terrain make broadband communications a lifeline for families, students, health care professionals, first responders, and employers. We at GCI are dedicated to bringing Alaskans the best broadband services as quickly as possible, even in the most remote villages. We welcome the Commission's attention to this matter and urge it to focus on the following four key issues.

First, broadband is most important to Americans living in rural areas. Urban and suburban areas offer vehicles other than broadband for civic participation, access to public safety resources, healthcare, education, and business. But broadband is frequently the only link between rural Americans and these opportunities and services. Broadband service is also, more broadly, rural America's link to the global community. Rural issues

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[1] *A National Broadband Plan for Our Future*, Notice of Inquiry, GN Docket No. 09-51, FCC 09-31, ¶1 (rel. Apr. 8, 2009) ("*Notice of Inquiry*").

should therefore not be one of a long list of concerns of the national broadband plan. They should be at its top.

Second, the availability of cost-effective, high-capacity, terrestrial middle-mile transport facilities is critical to improving broadband coverage in rural America. Without such facilities GCI and other rural carriers will not be able to bring true broadband services to many towns and villages throughout rural Alaska and rural America. Due to increasing demand, transport through satellites and other distribution technologies in rural America has become both inadequate and too costly. The national broadband plan must focus on partnering with industry to address this challenge.

Third, wireless last-mile technologies will power broadband delivery in rural America. The national broadband plan must include provisions to encourage the use of wireless technologies for this purpose and certainly must not discriminate against wireless technologies by favoring wireline technologies in regulations and support mechanisms.

Fourth, the national broadband plan's definitions of "broadband" should be flexible. Enterprise broadband, mass market fixed broadband, and mobile broadband are distinct classes of broadband that deliver bandwidth capabilities to meet a particular type of customer's demands at an appropriate price. A single mbps-based definition that applies to all three would be a mistake. The plan also should not punish remote communities that can only be served via satellite. A definition that excludes satellite technologies would abandon the most remote villages in Alaska.

I. The Benefits of Broadband to Alaska

Alaska is different. It covers 586,412 square miles[2] and has a population of 686,293 people.[3] That area is larger than Texas, California, New York, Pennsylvania, and Virginia combined – with a population density of only 1.17 people per square mile. The highway system is limited. Many villages are accessible only by air or water.

Alaska's dispersed population and difficult terrain make it very difficult to build out telecommunications facilities. Adding to the challenge, Alaska's prime construction season is only five months long each year, due to the climate. Nonetheless, GCI has invested hundreds of millions of dollars to bring telecommunications service to its customers, not only in Alaska's cities and towns but also in its most remote villages. In doing so GCI has experienced firsthand the power of broadband communications in the most rural parts of rural America.

A. Broadband and Healthcare

The Commission is seeking comment on how the use of broadband infrastructure can advance health care delivery.[4] GCI's experience in Alaska demonstrates how tele-health initiatives can make medical care available to remote regions of the country and improve the quality of that care.[5] Where rural hospitals and health clinics have

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[2] State & County QuickFacts, U.S. Census Bureau, *available at* http://quickfacts.census.gov/qfd/states/02000.html.

[3] Geography of Alaska, Alaska Office of Economic Development, *available at* http://www.commerce.state.ak.us/oed/student_info/learn/aboutgeography.htm.

[4] *See Notice of Inquiry* ¶¶81-85; Recovery Act §6001(k)(2)(D).

[5] *See Notice of Inquiry* ¶84 (seeking comment on "how improved broadband infrastructure and services can increase the quality of medical care available to unserved and underserved parts of the country through tele-health initiatives").

broadband, their doctors have access to specialist consultations, their patients have access to telemedicine and remote telemetry, and as is often critical in Alaska, their non-physician medical professionals staffing remote primary care facilities have access to advice and direction from doctors located far away. Importantly, universal service support is critical to the delivery of healthcare in Alaska. The Commission's Rural Health Care Program provides critical, direct support to end users across the state.[6]

GCI's ConnectMD is a dedicated medical network that serves rural and urban Alaska. It uses existing broadband facilities to connect clinics and hospitals so they can securely and reliably exchange health information.[7] Using GCI ConnectMD, a local practitioner in rural Kotzebue, Alaska, performed emergency, life-saving surgery guided by a specialist in Anchorage, who participated via video conference.[8] Kotzebue is a town of approximately 3,000 people located in the far north of Alaska, above the Arctic Circle. Severe weather conditions prevented travel to the nearest health center, approximately 200 miles away. Without broadband, the patient likely would have died. In this and other circumstances, the ability to make an informed decision not to charter a flight out can save significant costs for the patient and health care system, avoids unnecessary health risks, and provides reasonable treatment options when frequent harsh weather conditions eliminate flight options entirely.

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[6] *See* USAC, Rural Health Care, Automated Search of Commitments *available at* http://www.rhc.universalservice.org/funding/asc/ (query funding year 2008 and the state of AK).

[7] *See* About Us, GCI ConnectMD, *available at* http://www.connectmd.com/about.htm.

[8] *Telehealth in the Tundra: Remote Northwest Alaskan Villages Encounter Faster Access to More Sophisticated Medical Care*, Health Management Technology, March 2004 at 2.

Broadband is a powerful tool for emergency medicine, but in Alaska, it is also often the only way to receive routine medical care. Lacking nearby major hospitals and faced with huge distances, Alaskans rely on broadband for access to everyday specialists that urban-dwelling Americans take for granted.

B. Broadband and Education

The Commission noted in the Notice of Inquiry that "education is the key to our future economic success"[9] and asked how "a broadband plan [could] maximize the benefits that our nation can derive from distance learning."[10] GCI can attest that students greatly benefit when teachers integrate broadband-delivered educational services into the classroom. For example, GCI SchoolAccess is a suite of distance learning and Internet services delivering rich learning opportunities to students in underserved regions of the country. The program was designed by veteran educators and experienced technologists, and works to deliver the services and tools teachers need to create a highly interactive learning environment for their students.

Today, GCI SchoolAccess provides Internet and distance learning services to over 100,000 students with more than 30,000 endpoint connections throughout Alaska, New Mexico, Arizona, and Montana, and has provided more than 2 million minutes logged year-to-date on our video conferencing network.[11] Rural students learn algebra even when their community lacks a qualified instructor. They can videoconference with professionals to prepare them for the workplace or with authors to bring their

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[9] *Notice of Inquiry* ¶89.

[10] *Id.* ¶90.

[11] About Us, GCI SchoolAccess, *available at* http://www.schoolaccess.net/about.htm.

assignments to life and even meet remotely with their Congressional delegation in Washington to deepen their understanding of our government. These opportunities simply would not be available without access to broadband.[12]

As with telehealth, the Commission's universal service programs play an important role in education initiatives throughout Alaska.[13] The e-rate program supports not only telephone service but also investments that are critical to the use of broadband in our schools – including Internet connectivity and inside wiring. In fact, today schools across Alaska receive substantial support from the e-rate program, forming a strong foundation for more thorough use of broadband by our students and educators.[14]

C. Rural Broadband Must be a Central Concern of the National Broadband Plan

While broadband is bringing benefits uniquely important to Alaskans and other rural Americans, it is still not available to enough of the state. GCI is working hard to change that, in particular by investing in a long-haul terrestrial microwave system throughout the Yukon-Kuskokwin Delta and by undertaking the GCI Rural Wireless

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[12] In the News, GCI SchoolAccess, *Barrow Students "Meet" FCC Commissioner*, Apr. 23, 2009, *available at* http://www.schoolaccess.net/news_2009_04_23.html. (Commissioner McDowell held a video conference via the SchoolAccess network with students around the country while visiting Alaska).

[13] *See Notice of Inquiry* ¶92 (seeking comment on how the e-rate program "helps schools and libraries obtain affordable telecommunications, Internet access and internal connections").

[14] USAC, 2007 Program Statistics, *available at* http://www.universalservice.org/about/universal-service/fund-facts-charts/sl-Commitment-Disbursement.pdf (In calendar year 2007, Alaska received $14.1 million through the e-rate schools and libraries program.)

Initiative, which is bringing cellular telephone service—and potentially wireless broadband—to hundreds of formerly unserved Alaskan villages.[15]

But GCI and other rural companies simply cannot deliver broadband to enough rural Americans without support from the Commission and its sister federal agencies. Therefore, GCI requests that the Commission ensure that plans to address rural broadband are not merely one aspect of many in the national broadband plan. The Commission's recent *Report on a Rural Broadband Strategy* identifies many of the right issues but, as Acting Chairman Copps stated, it provides only a "down payment on the development of the national broadband plan."[16] Now is the time to take the next step for rural America.

To support rural broadband, the national broadband plan should find that: (1) access to cost-effective, high-capacity, terrestrial middle-mile transport facilities is critical to improving broadband coverage in rural America; and (2) wireless last-mile technologies will power broadband delivery in rural America. Therefore, the Commission and the Administration should encourage the expansion of terrestrial middle-mile facilities and the use of wireless technologies to advance the goal of better broadband access. The Commission certainly should not discriminate against middle-mile facilities or wireless technologies by favoring only last-mile facilities and/or

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[15] Press Release, General Communications Inc., GCI to Purchase Communications Operations of United Companies, Inc. (Oct. 15, 2007), *available at* http://www.gci.com/about/gciuci.pdf ("*GCI Press Release*").

[16] *Report on Rural Broadband Strategy*, Bringing Broadband to Rural America: Report on a Rural Broadband Strategy at 2-3 ¶8, GN Docket No. 09-29 (May 22, 2009) ("*Rural Broadband Strategy Report*").

wireline technologies in regulations, the Broadband Technology Opportunities Program ("BTOP"), or existing universal service programs.

II. The Importance of the Middle Mile to Alaskan Broadband

Expanding broadband service across rural America depends on access to cost-effective, high-capacity, terrestrial middle-mile transport facilities. Today, much of GCI's (and many other providers') middle-mile transport is accomplished using satellite services. Satellite service is costly and has limited throughput capacity. Increasing demand for bandwidth from existing broadband customers and GCI's commitment to expand broadband services to hundreds of new Alaskan villages make the current satellite transport system unsustainable as a permanent statewide delivery mechanism for broadband services. The satellite network simply cannot keep up with bandwidth demands, and even new satellite capacity would result in a broadband price point that consumers cannot afford. Even if affordable satellite middle-mile capacity emerged, many applications (e.g, video teleconference) are latency sensitive, and the only way to eliminate inherent satellite latency is to switch to terrestrial middle-mile service.[17]

The Regulatory Commission of Alaska ("RCA") agrees, stating that reliance on satellite for middle-mile transport "is *the major impediment* in providing next generation broadband speeds throughout the state, and particularly in sparsely populated areas," and additionally that "significant federal funding may enable the development of further

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[17] These challenges are unique to the delivery of broadband services. Satellite continues to be an effective transport medium for voice services.

middle mile infrastructure (fiber, microwave) that will allow Alaska to reduce its reliance on satellite transport throughout its rural areas."[18]

Other companies faced with expanding broadband in rural America have sounded similar notes. Sacred Wind Communications, a rural local exchange carrier serving mostly Navajo lands in New Mexico, likewise observed that, on Navajo lands, "[u]nder today's costs of satellite access, it would be necessary to limit the amount of access to community facilities and to individual homes," but "[w]ith fixed wireless systems, broadband capacities for commercial customers or community facilities" could be much higher and still affordable.[19] Verizon has also stated that in some rural areas "the cost of the additional transport mileage is high enough to impinge on a rural broadband provider's ability to offer services in those areas."[20]

Similarly, the New America Foundation stated:

> A great deal of the discussion on improving rural broadband access in the U.S. has focused on last-mile issues, connecting the residences and businesses in a local community. While this remains a difficult challenge, another key obstacle to universal high-speed broadband access is the connection of those last-mile networks to the Internet backbone. No community or network is an island; and increasingly access to the high-speed middle-mile links that carry Internet traffic to the backbone, and the escalating costs associated with transporting traffic among networks, have become fundamental barriers to spreading connectivity, promoting broadband competition, improving speeds and lowering prices.[21]

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[18] Comments of the Regulatory Commission of Alaska at 5-6, GN Docket No. 09-29 (filed Mar. 25, 2009) (emphasis added).

[19] Comments of Sacred Wind Communications, Inc. at 4, GN Docket No. 09-29 (Apr. 2, 2009).

[20] Comments of Verizon and Verizon Wireless at 11, GN Docket No. 09-29 (Mar. 25, 2009). *See also* Comments of the Consumer Federation of America and Consumers Union at 4, GN Docket No. 09-29 (filed Mar. 25, 2009) ("Middle mile is a necessary component of solving the problem of un- and under-served.").

[21] Comments of the New America Foundation at 5, GN Docket No. 09-29 (Mar. 25, 2009).

The importance of robust and affordable middle-mile facilities to the expansion of rural broadband—and the fact that a satellite middle mile alone cannot deliver urban-quality, universal broadband connectivity to Alaska—presents GCI with a challenge. The company must augment its satellite middle-mile transport with a terrestrial alternative. The new terrestrial network must connect communities within a region to each other and connect each region to the backbone. In a state as large as Alaska, with difficult terrain and severe weather, making these connections is a formidable challenge.

A major part of GCI's solution will be to employ a mix of terrestrial microwave and long-haul fiber technology. GCI, through its subsidiary, Unicom Inc., has made a major investment in DeltaNet, a long-haul broadband microwave network ringing the Yukon-Kuskokwim Delta ("Y-K Delta"), a region of approximately 30,000 square miles in western Alaska. DeltaNet currently connects over 30 rural communities, with populations ranging from 150 to 5,600, and was financed primarily by three loans from the RUS Distance Learning and Telemedicine Program. By this summer, DeltaNet, which has already commenced operations, will, where completed, link more than 40 villages to Bethel, the region's hub.[22]

Over time, the deployment of broadband microwave technology in the Y-K Delta and other regions can reduce bush Alaska's reliance on satellite for backhaul, providing a regional broadband service and a critical piece of the middle-mile solution. Moreover, as more traffic is brought "to the ground," satellite capacity is freed, making more bandwidth available to improve service performance to remaining satellite-served

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[22] *GCI Press Release* at 1.

communities. GCI envisions continuing expansion of terrestrial microwave and fiber technology throughout rural Alaska over time, under a deployment schedule for projects that is realistically paced with what technology can deliver, business cases can sustain, and financial markets can support. But GCI will need government commitment to speed the pace and, in some cases, ensure that the middle-mile facilities needed to bring broadband to rural Alaska are put in place.

The Commission's *Report on a Rural Broadband Strategy* recommended "that the Commission consider additional actions to address middle-mile connectivity as it analyzes the records being developed in open proceedings at the Commission."[23] GCI agrees. The national broadband plan should recognize how critical these middle-mile facilities are to the plan's goals and the Commission should encourage its sister agencies to account for these critical facilities in their support plans.

Existing Commission support mechanisms do not fund these critical middle-mile solutions. The current eligible telecommunications carrier structure and Universal Service Fund ("USF") are neither designed nor equipped to support terrestrial middle-mile transport, which is not a local exchange service and thus cannot be supported through USF. Instead, USF focuses on supporting last-mile distribution where necessary. However, focused one-time funding from the NTIA BTOP and RUS Broadband programs for "shovel-ready" projects could jump-start middle-mile solutions. Thereafter, Lifeline support for broadband will help support demand for the service,

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[23] *Rural Broadband Strategy Report* at 69 ¶ 154.

potentially developing a market for the service, such that network or carrier support would not be required.[24]

III. The Importance of Wireless Technologies to Alaskan Broadband

The Commission has recognized the importance of promoting deployment of wireless services, particularly in rural areas.[25] Supported by a robust and cost-effective middle-mile network, GCI would be in a position to expand its wireless last-mile broadband offerings in rural Alaskan villages throughout the state. GCI is bringing new villages online now, and it could accomplish this more rapidly with support for middle-mile facilities.

GCI's customers live in remote villages with extremely difficult terrain and severe weather. Many communities are not even served by roads. Stringing wireline last-mile facilities is impractical and uneconomic. Luckily, wireless technologies have made great advances and can now deliver high-quality broadband services to even the most isolated Alaskan villages.

For example, through the GCI Rural Wireless Initiative the company is committed to bringing advanced mobile wireless broadband services to hundreds of rural villages across Alaska, including some of the most isolated in the state, for the first time. The Rural Wireless Initiative will provide statewide mobility and roaming capabilities, improved emergency and security access, and a quality wireless alternative for consumers

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[24] Comments of GCI, WC Docket No. 05-337 (June 6, 2007).

[25] *See Notice of Inquiry* ¶42 (citing *Facilitating the Provision of Spectrum-Based Services to Rural Areas and Promoting Opportunities for Rural Telephone Companies to Provide Spectrum-Based Services*, WT Docket Nos. 02-381, 01-14, 03-202, Report and Order and Further Notice of Proposed Rule Making, 19 FCC Rcd 19078 (2004)).

who heretofore have had service inferior to that found elsewhere in the country–in those limited cases where wireless services were available at all. The system will support modern, digital wireless technologies, allow a full-featured CMRS experience, and provide a ready platform to deliver high-speed broadband.

GCI has already rolled out its new network to dozens of rural villages. Most of the villages scheduled to come online this year lack wireless voice service today. Advanced broadband service is almost universally unavailable. Even where wireless voice service is available, it is often a far cry from what consumers in other parts of the country are used to receiving.

The Rural Wireless Initiative represents the potential for tremendous expansion of rural broadband. The Commission should work to ensure that GCI, and others using wireless technologies to expand broadband, can continue to further the Commission's goals. To do so it should ensure that the national broadband plan includes provisions to encourage the use of wireless technologies for rural broadband. It certainly should not discriminate against wireless technologies by favoring wireline technologies in regulations or support mechanisms. The national broadband plan should therefore not favor wired last-mile connections over wireless local platforms, especially in light of Congress's clear preference for technical neutrality in this context.[26]

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[26] *See* The Food, Conservation, and Energy Act of 2008, Pub. L. No. 110-246, §6110, 122 Stat. 1651 (2008) ("For purposes of determining whether to make a loan or loan guarantee for a project under this section, the Secretary shall use criteria that are technologically neutral."). *See also* American Recovery and Reinvestment Act of 2009, Pub. L. No. 111-5, §6001(e)(1)(C), 123 Stat. 115 (2009) (stating that "the Assistant Secretary shall to the extent practicable promote the purposes of this section in a technologically neutral manner").

To recognize the role of wireless broadband to rural America, GCI requests that the Commission note the importance of the successful cellular unserved-area license system in the national broadband plan. GCI relies heavily on unserved-area licenses to deploy facilities in rural Alaska.[27] These licenses are central to GCI's ability to roll out new service in the future. CTIA recently submitted a petition to convert the nation's site-based cellular license system into a geographic market-area system.[28] The petition, as written, would eliminate unserved-area licenses, removing this important tool for bringing new wireless service to rural America. The unserved-area license allows non-incumbent carriers to deliver wireless services to communities left completely unserved by incumbents using frequencies that have propagation and power consumption characteristics that are far better suited to rural application than alternative frequencies. GCI serves more than 30 communities today through unserved-area licenses. And over the next three years the company plans to serve more than 70 currently unserved communities using the unserved-area application mechanism. An effective rural broadband strategy cannot proscribe the use of current regulatory programs, like unserved-area licenses, on which carriers already rely in deploying rural broadband services.

GCI also requests that the Commission recognize the tension between strict E911 location-accuracy rules and the use of wireless technologies to expand broadband in rural America. Unfortunately, the proposed E911 accuracy rules for GSM networks before the

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[27] Comments of GCI at 2, RM Docket No. 11510 (Feb. 23, 2009).

[28] Petition for Rulemaking of CTIA – The Wireless Association at 2-4, RM Docket No. 11510 (Oct. 8, 2008).

Commission[29] would be technically infeasible for rural areas such as the Alaska bush (where there are generally no PSAPs). Most of these tiny villages are served by only one, or at most two, cell sites. Terrestrial triangulation is thus impossible in these environments, and GPS-enabled handsets are not yet available for small GSM carriers.

GCI's Rural Wireless Initiative demonstrates the tremendous public safety benefit from launching modern regional wireless service in these areas, even when precise E911 accuracy is not technically feasible. The deployment means that public safety officers in regional centers can travel to outlying villages and have working mobile phones for the first time. Additionally, residents can, for the first time, summon help when they need it, even if they are away from home. This is very significant in areas with severe winters, shifting ice, and other extreme conditions.[30] Imposing E911 regulations that carriers simply cannot comply with would undermine carriers' ability to launch new wireless service to these communities for fear of Commission enforcement. The net result would be a significant step backwards for public safety. Moreover, the same wireless infrastructure provides the ideal platform for bringing mobile broadband to these communities using the most efficient, future-proof technology available. Foreclosing this wireless and broadband network because of the inability to meet a technically impossible

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[29] Letter from Brian Fontes, Chief Executive Officer, National Emergency Number Association, Robert M. Gurss, Director, Legal & Government Affairs, The Association of Public-Safety Communications Officials, and Robert W. Quinn, Jr., Senior Vice President, Federal Regulatory, AT&T, to Kevin Martin, Chairman, Federal Communications Commission, PS Docket 07-114 (Aug. 25, 2008).

[30] Alex DeMarban, *Cellular Service Hits Bush Alaska A Decade After Rest of Country*, The Arctic Sounder, (Dec. 27, 2008), *available at* http://www.adn.com/news/alaska/story/634862.html.

regulatory obligation would be contrary to the public interest of those living in remote Alaska.

IV. The National Broadband Plan Should Adopt a Flexible and Technically Neutral Definition of Broadband

Finally, GCI recommends that the Commission establish a flexible definition of "broadband."[31] The definition should recognize the particular challenges of providing broadband in extremely rural communities and not include rigid speed thresholds that exclude wireless broadband or broadband delivered to extremely remote communities via a satellite middle-mile (even microwave systems will be impractical for some areas of Alaska) as these may be the only feasible ways of delivering service to some rural consumers.

The Commission may determine that threshold transmission speed requirements are necessary. If so, the plan should identify customized speeds for each product market. Strategic community institutions such as hospitals, schools, and governments may require very high throughput levels. If so, they will need this enterprise-level capability delivered to a very limited number of locations, making dedicated transmission facilities economically feasible. Alternatively, consumers of fixed mass market broadband service may require lower bandwidth than these enterprise services. But serving these consumers means delivering this capability to millions of homes across the nation, making dedicated facilities economically infeasible. Different again is the case of mobile broadband service. Current mobile consumers do not require transmission speeds as high as those needed by fixed enterprise customers, and mobility creates unique technical challenges.

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[31] *See Notice of Inquiry* ¶15 (seeking comment on "how this definition should capture the various issues we should consider as we define broadband capability").

A single definition of broadband with a single mbps-based speed threshold that applies to enterprise, mass market fixed, and mobile customers would therefore be a mistake.

Any threshold speed requirement also should not penalize the most challenging environments, some of which can be reached only via satellite. A community that must reach the national backbone by satellite link will have lower throughput than one that can use fiber or microwave. If the national broadband plan sets a threshold speed that excludes participation by those satellite-fed remote communities, it would deny these consumers participation in important programs designed to reach exactly these rural Americans.

Finally, there is no need for threshold speed requirements to be symmetrical. Most use is still downstream rather than upstream. Mandating symmetrical capacity would therefore unnecessarily exclude technologies that give consumers the broadband experience they demand.

Conclusion

GCI is dedicated to furthering the Commission's goal of delivering the best broadband services to Alaskans as quickly as possible, even in the most remote villages. GCI recommends that the Commission make this common goal the centerpiece of the national broadband plan. This will mean acting to improve the availability of cost-effective, high-capacity, terrestrial middle-mile transport facilities, including provisions to encourage the use of wireless broadband technologies, and adopting a flexible definition of "broadband." GCI looks forward to working collaboratively with the Commission on this important proceeding.

Respectfully submitted,

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