

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

In the Matter of	)	
	)	
A National Broadband Plan for	)	
Our Future	)	
	)	
International Comparison and Consumer	)	GN Docket No. 09-51
Survey Requirements in the Broadband	)	
Data Improvement Act	)	GN Docket No. 09-47
	)	
Inquiry Concerning the Deployment of	)	GN Docket No. 09-137
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, as Amended by	)	
The Broadband Data Improvement Act	)	
_____	)	

**Reply Comments of the  
Alaska Telephone Association  
-- NBP Public Notice #1**

The Alaska Telephone Association (“ATA”) offers these comments in response to the Commission’s request for tailored comments on defining broadband for purposes of development of a National Broadband Plan (“NBP”). As stated by Alaska’s Office of the Governor in comments to the National Telecommunications and Information Administration, U.S. Department of Commerce, and Rural Utilities Service, U.S. Department of Agriculture, ‘When it comes to access to broadband, Alaska residents are the most “unserved” and “underserved” population in the United States.’<sup>1</sup> We concur with that assessment and anticipate that the conclusions and policies resultant from this

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<sup>1</sup> State of Alaska Response to NTIA, USDA RUS Joint Request for Information, April 9, 2009; p2.  
Alaska Telephone Association  
GN Docket No. 09-51  
September 8, 2009

inquiry will have far reaching impacts on each Alaskan. We hope that those policies will serve to bring us closer to the national standard of broadband accessibility than to distance us from it.

### Interpreting the Term

The Notice identifies as a fundamental question the interpretation of the word “broadband” as it is used in the Recovery Act and then suggests that such understanding would be useful for interpreting it in other contexts. We agree that understanding its meaning in the Recovery Act is basic, but after understanding the meaning of this singular term, it should not be interpreted to mean something else in a different context. Absolutely “broadband” should be an evolving standard -- most likely a rapidly evolving standard -- but the term is only useful as a form of communication if people have the same understanding of its meaning.

The Commission is charged with developing a national broadband plan for the *entire* United States. Alaskans want “broadband” in our state to be considered in the same context as “broadband” on the Eastern seaboard.

### Form and Performance Indicators

The national broadband plan will be a contract with costs and services coming from and being used by the public. Advertised throughput rates do not fulfill a contract for services; delivered throughput rates do that. Laboratory speeds and capacities under ideal conditions are irrelevant to a business or individual attempting to use “broadband” services during peak periods of demand. As access to broadband becomes commonplace

and technological capabilities evolve, an individual should be able to download and upload data, movies, communications and whatever with the expectation that it will happen now. However, in the interim (and it may be a very long interim), a national broadband standard of measurement should be based on the services available at peak hours of demand in a representative sampling of urban communities. Rural America must receive comparable broadband services.

As discussed earlier, multiple definitions for “broadband” would be deceptive or, at best, confusing. For all the Commission’s history with “technological neutrality” it would seem incongruous to assign a term various definitions based on specific technologies. We understand that technologies’ capabilities vary. A massive amount of data would be carried by a fiber optic cable faster than it would be in a wireless mode. If people have a choice of both technologies or as yet undiscovered technologies, it would not be inappropriate to measure those peak urban samplings for each technology to determine a standard. However, if a rural person had access only to a wireless network, it would not be accurate to compare that service to the urban sampling and call both by the same term; “broadband.”

Performance indicators must be measured at each segment of a network. An end-to-end measurement would only determine a sufficient or insufficient capability, but would not identify the location of a bottleneck when the end-to-end service falls below the standard.

Experience in Alaska has shown that the price of capacity in the middle-mile makes delivery of bandwidth to small populations prohibitive. To receive broadband support, a middle-mile provider should be required to offer capacity on a carrier-neutral,

non-discriminatory basis. Additionally, middle-mile transport costs should be considered as eligible in calculating broadband universal service support.

### Thresholds

As discussed previously, the standard – the *minimum* standard – should be based on the peak demand service capabilities of the sampled urban communities.

### Updates

Evolution of broadband standards is a foregone conclusion. Predicting the capacity and uses of the broadband network ten years from now and then reading those predictions at the end of that period would probably demonstrate a very limited vision. The technological devices and services that frustrate us today due to their lack of speed and other imperfections would have been coveted in 1999 had we dreamed of them. The urban areas that should be sampled will set the standard and service there will evolve because of customer demand and market economics. The national broadband plan must insure that less economically viable, less densely populated, and more remotely located areas do not lag far behind in receiving comparable services.

### Parity and Common Sense

The successful implementation of a national broadband plan, perhaps nearly as costly as it will be valuable, must be efficient in its distribution of universal service funding. To that end we believe it is imperative that every applicant for broadband universal service funding demonstrate its own costs. Additionally, we agree with

NTCA's positions that all broadband providers who choose to receive broadband universal service support should be subject to a Title II earnings review. We also support the reclassification of wireline and cable broadband Internet access service as a telecommunications service.<sup>2</sup>

### Conclusion

The ATA recognizes that a properly crafted and implemented National Broadband Plan will benefit no people more than the residents of Alaska. A successful plan must have a uniform understanding of the term "broadband." Performance should be measured during times of peak usage and the standard set by what is available in sampled urban communities. The broadband standard should not be static, but evolving as technology allows and as the market demands.

Broadband should be technology neutral. If an end-user has a reasonable expectation of having access to broadband, the medium of delivery is irrelevant. End-to-end measurement would not evaluate each segment of a sub broadband-standard connection. Segments should be evaluated independently.

Middle-mile transport must be available on a non discriminatory basis and the costs should be considered in calculating broadband universal service support. All recipients of broadband universal service support should be subject to a Title II earnings review based upon their own costs.

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<sup>2</sup> Initial Comments, National Telecommunications Cooperative Association, GN Docket No. 09-51, FCC 09-31; June 8, 2009.

Respectfully submitted,

A handwritten signature in black ink that reads "Jim Rowe". The signature is written in a cursive style with a long horizontal line extending to the right.

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