09-51, 09-47, 09-137

Comments-NBP Public Notice #1

The definition of broadband is not one singular definition; rather, it is defined very differently according to what area you live in. For example, in Japan, one might define broadband as being 15.8 Mbps (megabits per second)[1] or above, which is what their median speed is. However, if you live in the rural US, you may think broadband is any speed faster than dial-up, which speed is normally 33 Kbps (kilobits per second), but can go all the way up to 56 Kbps[2]. If one lives in Japan, he would not think that 57 Kbps is anything close to broadband; he wouldn't even consider it high speed. This leads me to believe that the definition of broadband should not be just one, but be several depending on where one lives.

The definition(s) of broadband should also take into account the high traffic of people using it. This needs to be factored into the definition, where there is a broadband that is a *theoretical* speed and a broadband that is the *minimum* speed. In an urban neighborhood, the bandwidth need would be higher than a rural neighborhood, so *theoretically* the speeds in the rural neighborhood would be faster than the speeds in the urban neighborhood. However, the urban neighborhood would still have broadband, just not the speed that you should *theoretically* get.

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[1] Paczkowski, J. (2009, August 24). US Broadband Speed Worst Among 29 Countries Surveyed. Retrieved September 4, 2009, from Digital Daily: http://digitaldaily.allthingsd.com/20090826/cwa/

[2] helpwithpcs.com. (2001). *Internet Connections Explained*. Retrieved September 4, 2009, from HelpWithPcs.com: http://www.helpwithpcs.com/internet/internet-connections.htm

The FCC currently defines broadband as having a minimum speed of at least 768 Kbps[3]. However, the state of Delaware has the fastest broadband speeds offered in the US being 9.91 Mbps[4]. So *theoretically*, if I was in Delaware I would be getting 9.9 Mbps. But actually, I may be getting speeds around 4.5 Mbps because of the network lag or other things that would slow me down. In this case, the *theoretical* broadband definition for where I live would be 9.9 Mbps, but the *minimum* speed being around 4.5 Mbps.

Nationwide, the median broadband speed is around 5.1 Mbps[1]. In a nationwide definition of broadband, the *minimum* speed should be 5.1. The *theoretical* speed is more difficult to determine. *Theoretical* speeds should be based off of the most commonly used broadband technology today. For example, if the fastest speed you could get through DSL was 6 Mbps (which I am not saying it is…this is only an example), and it was the most commonly used way to access broadband internet (again, I am not saying it is), then you could say your *theoretical* speed is 6 Mbps, although other things might hinder you from getting that fast of a connection.

Technology changes quickly, therefore, your definition(s) of broadband should change along with them. While I don't think that the official definition(s) should change very often, I think that they should change often enough so that we would not be stuck with "outdated" broadband because of the definition(s). Within every two years, the FCC

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[3] Martin, K. J. (2009). *Statement of Chairman Kevin J. Martin: Re: WC Docket No. 07-38 and GN Docket No. 07-45.* Retrieved September 4, 2009, from Federal Communications Commission: http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-280909A2.doc

[4] Tech Crunchies. (2009, August 26). *States With Fastest Broadband Internet Speed in the USA.* Retrieved September 4, 2009, from Tech Crunchies: http://techcrunchies.com/states-with-fastest-broadband-internet-speed-in-usa/

should put out another public input asking our definition of broadband. The FCC should also survey the companies that provide the broadband access to see what technology has been updated, and/or what speeds they are currently offering to customers. The *minimum* speed for that area should stay the same, while the *theoretical* speeds for that area should change. The *minimum* speed will change only when the FCC receives new information about the median speeds of that particular area.