

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

In the Matters of

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, as Amended by the Broadband Data Improvement Act

A National Broadband Plan for Our Future

GN Docket No. 09-137

GN Docket No. 09-51

**Comment
By Wayne Longman**

Based on Page 45 of the presentation by staff at the September 29, 2009 Commission Meeting there appears to be an opportunity to provide an optimum mixture of services based on a desired total investment.

As a first order approximation the “80/20 Rule of Thumb” law is applied below, assuming that 80% of the installation costs are for 20% of the installations and 20% for 80% of the installations.

Applying this shows that 80% of the population can be served with 100+ MBPS for \$70B, and the remaining 20% by one of the first three tiers for a relatively small incremental cost.

Capability at estimated commercial deployment	Housing units requiring upgrade to reach each tier	Incremental cost to universal availability of these advertised speeds (Best estimate)	Leveraging the 80/20 Rule Where 80% of Cost Is for 20% of Population		Incremental Cost By Scenario	Total Incremental Cost By Scenario
			% Population	% Cost		
Mbps	Millions	Billions			Billions	Billions
.768-3	3-6	20	20	80	16	86
3-10	7-10	35	20	80	28	98
10-30	33-37	50	20	80	40	110
100+	111-116	350	80	20	70	

The Commission staff has better cost spreads than this assumption, and the costs by Scenario may be even lower.

In the event these orders of cost are realistic, the FCC should recommend to Congress that it fully fund broadband deployment. One Hundred Billion dollars is a significant amount, but it will be a direct employment stimulus that will also increase personal and business productivity in all sectors, and create a lasting national infrastructure improvement.

Wayne Longman

Palm Desert

10/04/2009