FCC Docket Numbers: 09-47, 09-51, 09-137

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COMMENT

BROADBAND DEFINITIONS

Comments – NBP Public Notice #1

relating to

GN Docket Nos. 09-47, 09-51, and 09-137

from

Thomas Bleha

Author of *Overtaken on the Information Superhighway:*

How the U.S. Lost Internet Leadership and What to Do About It

in response to a request by the Federal Communications Commission

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I am surprised by this request for comments; it implies that the Commission does not have a firm grasp of what is going on in the country and the world.

1. **Form, Characteristics, and Peformance Indicators, and**
2. **Thresholds**

But, since you have asked, I believe **we need a range of definitions that relate directly to the state of broadband in the world's advanced countries** – not the current status in the United States, or today's possible uses. What the FCC should be concerned about is tomorrow's uses, not today's.

Broadband should be defined by actual *delivered* speed to households and businesses – downstream and up.

As for **landline broadband, symmetrical gigabit (1,000 Mbps) residential or business service** is now available in Japan, South Korea, Hong Kong, and

Singapore. That sets the upper level of a definition of broadband. Let's call that ***ultra-fast* broadband**.

The second tier is **symmetrical, 100 Mbps, fiber broadband residential or business service** that is now the norm in Japan, and the near-term goal of most advanced countries. Today, symmetrical 100 Mbps fiber residential or business service qualifies as ***high-speed* broadband**.

The third tier is **asymmetrical 50-99 Mbps residential or business ervices**. Those could include ADSL, cable, and fiber. Today, those qualify as ***medium-speed* broadband.**

The bottom tier is **asymmetrical 768 Kbps to 49 Mbps residential or business services** that include nearly all of the residential services and most of the business services in the United States today: ADSL, cable, and fiber. Today, viewed from a global perspective, these are ***basic* or *low-speed* – embarrassing – broadband.**

Turning to wireless, *the same definitions should apply*. WiMax is capable of 70 Mbps, medium-speed broadband. LTE promises 100-300 Mbps, high-speed broadband. Since that is the case, it makes no sense to define wireless broadband differently than landline broadband. The Japanese and South Koreans will introduce 4G (LTE) service this year or next, and the Europeans won't be far behind.

Why are these broadband definitions necessary? Because the FCC's artificially low broadband definitions have persuaded many Americans that we are keeping pace with the world's broadband leaders when, if fact, the country has slipped badly. What is needed now are definitions that accurately reflect the state of broadband service in leading nations. **Those are the definitions we must use if we are to construct the essential networks of the 21st centry: linked fiber and high-speed wireless, so-called ubiquitous networks**.

3. Updates

Because this is a dynamic situation, **the definitions should be revised every five years**.

Good luck!

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