

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
International Comparison and Consumer Survey Requirements in the Broadband Data Improvement Act)	GN Docket No. 09-47
)	
A National Broadband Plan for Our Future)	GN Docket No. 09-51
)	
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)	GN Docket No. 09-137
)	

**COMMENTS OF CENTURYLINK ON NBP PUBLIC NOTICE #12
(CONNECTING ANCHOR INSTITUTIONS)**

As a leading provider of high-quality voice, broadband and video services to consumers in rural areas and smaller cities, CenturyLink supports the goal of providing high-quality broadband connectivity to key public institutions as a part of the broader goal established in the American Recovery and Reinvestment Act (ARRA) of deploying broadband infrastructure throughout America.

CenturyLink has had the opportunity recently to analyze the cost of providing higher levels of broadband service to anchor institutions within the rural service areas we serve. Based on this recent analysis, CenturyLink offers two observations in response to the cost model and estimates filed by the Bill and Melinda Gates Foundation regarding the cost of “providing fiber

optic connectivity to anchor institutions, such as public schools and libraries, community colleges, and hospitals.”¹ The first observation is that the cost model appears to leave out the critical component of backhaul (or middle mile) costs. At the September 2009 Commission meeting, the staff of the Omnibus Broadband Initiative recognized at the September 2009 Commission meeting can be a substantial cost component in deploying broadband, including fiber-optic connectivity. This can be accounted for either as additional capital investment or as ongoing operating cost. The Bill and Melinda Gates Foundation’s cost model and estimates consequently may be inaccurate.

Second, it appears that the cost model assumes anchor institution placement that is unrealistic. It is substantially different from CenturyLink’s experiences serving rural America. The model assumes an average loop length of 20,000 feet to connect anchor institutions in rural America. In CenturyLink’s experience, however, anchor institutions tend to be located far closer to the fiber access points that are currently deployed in rural areas. Specifically, anchor institutions are nearly always located in or close to the towns or other aggregations of population density that are located in rural areas.

This makes sense, as anchor institutions such as schools, libraries, and hospitals are designed to serve more than a handful of people. In other words, the same economic factors that lead telecommunications network points of aggregation to be located in the more densely populated parts of rural areas likewise lead to anchor institutions to be located in the same relatively more densely populated areas. Therefore, in CenturyLink’s experience, anchor institutions in the parts of rural America served by CenturyLink generally are located relatively close to central offices and other points of aggregation in our network. To the extent that cable

¹ *Comment Sought on Cost Estimates for Connecting Anchor Institutions to Fiber*, GN Docket No. 09-47, Public Notice, DA 09-2194 (Oct. 8, 2009).

networks are deployed in the same areas, the anchor institutions are similarly located relatively close to headends or other points of aggregation in the cable networks.

The fact that anchor institutions typically are located close to broadband network points of aggregation in rural America means that those anchor institutions by and large are already capable of receiving fiber optic broadband connectivity today. It may be the cost of purchasing such high-capacity services is beyond the operating budgets for the anchor institutions, but the opportunity does not appear to be lacking.

Stated another way, most anchor institutions are located in areas served by broadband today, even in rural America. This means that providing fiber to these anchor institutions is unlikely to improve the build-out economics substantially in currently unserved or under-served areas. In particular, providing fiber to these institutions does not appear to assist directly with last-mile build-outs, for example by providing materially shorter loop lengths.

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In conclusion, CenturyLink supports the goal of providing increased broadband capabilities through fiber-optic connectivity to anchor institutions in all parts of America, including high-cost rural areas. Based on our experience, providing such increased connectivity will require additional backhaul investment and operating expense that appears to be omitted in the model filed by the Bill and Melinda Gates Foundation. Moreover, based on our experience, it appears likely that fulfilling the laudable goal of connecting anchor institutions with fiber-optic broadband service will do little to improve the economics of deploying broadband to currently unserved and under-served areas.

Respectfully submitted,

CenturyLink

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