

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

In the Matter of)
)
Inquiry Concerning the Deployment of) GN Docket Nos. 09-47 and 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)
)
A National Broadband Plan for Our Future) GN Docket No. 09-51

To: The Commission

**COMMENTS – NBP Public Notice #26
THE WIRELESS INTERNET SERVICE PROVIDERS ASSOCIATION**

The Wireless Internet Service Providers Association (“WISPA”) provides these Comments in response to questions asked in NBP Public Notice #26¹ to urge the Commission to incorporate into its National Broadband Plan recommendations that will address the questions of whether spectrum currently licensed to television broadcast stations could be partially or completely repurposed for wireless broadband use.

As discussed herein, WISPA believes that the Commission must explore all avenues to ensure that broadband service is available to the 24 percent of American households that do not have true broadband access available at home.² Given that many

¹ Public Notice, “*Data Sought on Uses of Spectrum*,” NBP Public Notice #26, DA 09-2518 (rel. Dec. 2, 2009) (“*Public Notice*”). By Public Notice dated December 22, 2009, the Commission, citing Section 1.4(e)(1) of the Commission’s Rules, stated that because of adverse weather conditions on December 21, 2009, “[a]ll paper and electronic filings that were due on December 21 are now due on December 22, 2009.”

² See Industry Report, “Evolving Metrics: New Levels of Accuracy Reveal Increased Take Rates,” Brian Webster Consulting and The Gadberry Group (November 2009) at Table 2, attached hereto as Exhibit 1.

of these persons reside in rural and remote areas that cannot be efficiently or economically served by wired (*i.e.*, DSL or cable) technologies, identifying and allocating additional fixed wireless spectrum will be necessary to bridge this broadband divide.

Background

WISPA was founded in 2004 and represents the interests of more than 300 wireless Internet service providers (“WISPs”), vendors, system integrators and others interested in promoting the growth and delivery of fixed wireless broadband services to Americans. WISPA estimates that more than 2,000 WISPs operate in the United States today. WISPA’s ongoing research reveals that WISPs cover more than 2,000,000 square miles in all 50 states. Using primarily license-free frequencies authorized under Part 15 of the Commission’s Rules and licensed-lite services in the 3650-3700 MHz band under Part 90 rules, WISPs provide fixed wireless broadband services to more than 2,000,000 people in residences, businesses, hospitals, public safety locations and educational facilities.

In other Comments it has filed in the National Broadband Plan proceeding, WISPA has identified many of the barriers that inhibit their ability to provide service. Certainly, affordable and expeditious access to towers, middle mile and second mile infrastructure remains a problem, and WISPA is pleased that the Commission plans to address these concerns in the National Broadband Plan.³ WISPA also has recommended overhauling the Universal Service Fund to provide subsidies for broadband and to

³ See News Release, “Options for a National Broadband Plan,” released Dec. 16, 2009. See WISPA Comments filed Nov. 4, 2009 in response to Public Notice, “*Comment Sought on Impact of Middle and Second Mile Access on Broadband Availability and Deployment*,” NBP Public Notice #11, DA 09-2186, GN Docket Nos. 09-47, 09-51 and 09-137 (rel. Oct. 8, 2009).

eliminate the excesses in the legacy voice support system that is costing ratepayers billions of dollars.⁴ WISPA has recognized the need for 300 megahertz of additional spectrum for fixed wireless broadband⁵ to address existing congestion in the license-free bands and the growing demand for bandwidth-intensive content, services and applications. In the short-term, WISPA has urged the Commission to modify its rules for existing spectrum allocations to enable spectrum to be deployed more efficiently and economically, especially in areas where wireline technologies are not likely to reach. Adopting WISPA's recommendations will encourage private investment in fixed wireless deployment and help bring broadband to rural, unserved and underserved areas.

Discussion⁶

1. Comparing Spectrum Benefits.

WISPA believes the following factors must be kept in mind when comparing the benefits of spectrum used for over-the-air television broadcasting versus the benefits of using that same spectrum for wireless broadband services.

First, the term "wireless broadband" is far too general. "Wireless broadband" consists of more than simply "mobile broadband" (*i.e.*, cellular broadband). "Wireless broadband" also includes "fixed wireless broadband" delivered by WISPs using a fixed infrastructure at both the base station and at the customer premise end of the wireless circuit. It is crucial to keep this distinction between "mobile broadband" and "fixed

⁴ See WISPA Comments filed Dec. 7, 2009 in response to Public Notice, "*Comment Sought on the Role of the Universal Service Fund and Intercarrier Compensation in the National Broadband Plan*," NBP Public Notice #19, DA 09-2419, GN Docket Nos. 09-47, 09-51 and 09-137 (rel. Nov. 13, 2009).

⁵ See, e.g., WISPA Comments filed Oct. 23, 2009 in response to Public Notice, "*Comment Sought on Spectrum for Broadband*," NBP Public Notice #6, DA 09-2100, GN Docket Nos. 09-47, 09-51 and 09-137 (rel. Sept. 23, 2009) ("WISPA Spectrum Comments") at 19.

⁶ WISPA's comments respond to the first three questions in the *Public Notice*.

wireless broadband” in mind because the two different types of “wireless broadband” providers deliver different services.

Second, a uniquely different market is served by fixed wireless broadband providers compared to the market served by mobile broadband providers. Fixed wireless broadband providers bring the benefits of broadband to groups of people in fixed locations, families in their homes and employees at their place of work. In contrast, mobile broadband providers bring voice and data service to singular individuals as they travel and move about.

Third, fixed wireless providers deliver vastly more bandwidth (approximately ten times more) than mobile broadband providers. Fixed wireless providers typically deliver several **megabits** per second (Mbps) while mobile broadband providers typically deliver several hundred **kilobits** per second (Kbps) to mobile end users. Fixed wireless broadband providers deliver sufficient bandwidth to allow **groups** of people (*e.g.*, families and groups of employees) to **simultaneously** benefit from broadband access. In contrast, mobile broadband providers deliver only enough bandwidth for a single (mobile) individual to benefit from broadband access. Mobility is the main benefit delivered by mobile broadband providers but mobile broadband providers do not deliver enough bandwidth to allow a family to use the Internet or enough bandwidth to meet the needs of a company that seeks to conduct business over the Internet.

WISPA urges the Commission to keep this “benefit differential” in mind when evaluating the benefits that people receive from providers that use wireless spectrum to deliver (a) high-capacity, two-way, fixed broadband service, or (b) lower-capacity, two-

way, mobile voice and data service, or (c) medium capacity, one-way, fixed **and** mobile broadcast television service.

2. Economic Impact of Insufficient Spectrum.

The economic impacts of having insufficient spectrum for fixed wireless broadband are severe. Unserved and underserved families cannot enjoy the benefits of broadband. They cannot do their banking from home. They cannot access current news from home. They cannot book an airline flight or a rental car from home. Students cannot use the Internet to study from home. Unemployed workers cannot search for a job, contact a recruiter or upload a resume from home.

Rural businesses without broadband cannot use email to efficiently correspond with their customers and their suppliers. They cannot create or update their web site. They cannot obtain current market pricing information. They cannot exchange computerized sales data or customer information with their employees or with their customers. They cannot use bandwidth-intensive applications such as web-based conferencing or voice-over-IP (VoIP). In short, the people who live in the 24 percent of American households that do **not** have access to broadband cannot live “normal” lives or participate in normal work lives compared to the people who live in the 76 percent of households that **do** have access to broadband.

Only Commission action to allocate sufficient spectrum for fixed wireless broadband – both quality and quantity – will help fill these needs. As a first step, the Commission should conduct a detailed audit of all commercial and governmental spectrum⁷ This audit should be comprehensive and should not simply identify unused

⁷ See WISPA Spectrum Comments at 19-20.

spectrum bands for allocation, but should also assess utilization and efficiency of existing spectrum. Just as the Commission will consider the extent to which the spectrum assigned to television broadcasters may or may not be able to be reduced, the Commission should also consider how the unused or underutilized spectrum assigned to other services may be able to be repurposed. For instance, is there a pattern of warehousing of Part 101 microwave frequencies? Are ten-year build-out rules too lenient? Should forfeited spectrum be made available more quickly? Answers to these questions may indicate that spectrum can be used more efficiently and that some spectrum may be re-allocated.

Second, as WISPA has previously advocated,⁸ the Commission should modify its rules for already-allocated spectrum, including the fixed wireless TV white space spectrum and the 3650-3700 MHz lightly-licensed spectrum. As an interim measure, the Commission should state in the National Broadband Plan that it will be favorably disposed to approving waivers of power limits in rural areas where higher-power operations would not cause harmful interference to licensees entitled to protection. These measures would be consistent with the Commission's desire to make "[m]ore productive use of existing bands."⁹ WISPA respectfully urges the Commission to take action at the earliest possible moment to approve these requested changes.

3. Impact of Repacking Broadcast Spectrum

The Commission's questions and recent literature suggest that the Commission may be considering "repacking" or reclaiming broadcast spectrum for wireless broadband. The very suggestion that this is on the table is of great concern to WISPA.

⁸ See *id.* at 7-16.

⁹ National Broadband Plan Policy Framework, FCC Open Meeting, Dec. 16, 2009, at 15.

The open issues in the TV white spaces proceeding coupled with the potential that TV white space spectrum may be included in a spectrum repacking could chill innovation and development of technology and equipment for fixed wireless service in white space spectrum. Quite simply, manufacturers may not be willing to invest in TV white space equipment if the pending petitions for reconsideration are not acted upon and if the Commission may be limiting the white space spectrum and, potentially, modifying the technical rules for whatever white space remains.¹⁰ Without development of equipment, the chilling effect could render the TV white spaces a white elephant – unutilized because of changing policy objectives. Moreover, this result would be inconsistent with the “option” of “[p]reserving spectrum for unlicensed devices,” which the Commission will address in the National Broadband Plan.¹¹

Conclusion

WISPA appreciates this opportunity to participate in the creation of a National Broadband Plan that will significantly contribute to improving the economic well-being of Americans. To realize this improvement, WISPA respectfully requests that the Commission undertake a comprehensive audit of spectrum to identify substantial additional spectrum for fixed wireless broadband, a service that is very different from mobile wireless service in many respects. In the short-term, the Commission can take action that will enable existing spectrum to be used more efficiently and cost-effectively.

¹⁰ *See id.* at 17 (Commission notes the “option” to “[r]esolve pending spectrum & allocation use issues, including . . . TV White Spaces”).

¹¹ *Id.* at 18.

WISPA also urges the Commission to protect the availability of TV white space spectrum for fixed wireless broadband use and proceed to quickly act on the white space rules changes addressed in WISPA's Petition for Reconsideration.

Respectfully submitted,

**THE WIRELESS INTERNET
SERVICE PROVIDERS ASSOCIATION**

December 22, 2009

By: */s/ Richard Harnish, President*
/s/ Jack Unger, Chair of FCC Committee

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Exhibit 1

Evolving Metrics:
New Levels of Accuracy Reveal
Increased Take Rates

November 2009

Document Objective

This document describes the methodology and sources used in calculating a more current and accurate "Take Rate" for broadband in the United States, resulting in an increase over previous calculations.

Background

Thanks to funding through a variety of sources – the American Reinvestment and Recovery Act (ARRA), Broadband Stimulus under the BTOP, and BIP programs offered by the NTIA and USDA Rural Utilities Service (RUS) programs – much attention has been focused on broadband penetration, take rates and adoption rates in the United States. Recent round-one RUS program applications required broadband details, but a lack of information has limited both the availability of comprehensive data and overall study of the issue.

For years, the Federal Communications Commission (FCC) has collected data from broadband Internet providers using their Form 477. This information indicates the number of customers, broadband speeds, pricing and whether customers are residential or business class. Data had been tabulated at the Zip™ code level, but the collection process was recently modified to provide results at the Census Tract level instead.

Given access to this comprehensive database of information, it would be possible to determine broadband availability to a reasonable level of geographic accuracy. Unfortunately, access on a granular level outside of the FCC is not permitted, due in large part to agreements struck with the carriers to ensure their most important data assets would be protected from disclosure to competitors.

Existing Resources

Each year, the FCC releases a report¹ to Congress called "The State of Broadband in the US." The information in this report is provided at a state level, and has been used to tabulate broadband penetration rates. The calculation is determined by dividing the total number of reported residential subscriber lines by the total households reported² for the same time period in each state, resulting in a take rate for the state as a whole.

While this approach provides good directional information at macro levels, it does not provide the much-needed broadband penetration rates required for analysis of *only the areas where broadband services are deployed*.

In August of 2009, Brian Webster Consulting teamed with data provider Gadberry Group to design and prototype a method that would provide near address-level precision for broadband consumption and take rates. In the paragraphs that follow, we will describe what we believe to be the most accurate method possible to quantify take rates at micro levels of geography.

"[The existing approach] does not provide the much-needed broadband penetration rates required for analysis of *only the areas where broadband services are deployed*."

¹ High-Speed Services for Internet Access: Status as of June 30, 2008 www.fcc.gov/wcb/stats

² <http://www.census.gov/popest/housing/HU-EST2008-4.html>

Data Sources

Three sources of data were used as primary information for the take rate model:

- FCC Report to Congress "High Speed Services for Internet Access: Status as of June 30, 2008"
- Census Bureau Annual Estimate of Housing Units for Counties
- Gadberry's Broadband Served Indicator Data

FCC Data

Each year, the FCC releases a report³ to Congress called "The State of Broadband in the US." The information in this report is provided at a state-level only.

Census Data

The Population Estimates Program publishes total resident population estimates and demographic components of change (births, deaths and migration) each year. It also publishes estimates by demographic characteristics (age, sex, race and Hispanic origin) for the nation, individual states and counties.

In addition to the resident population universe, the census bureau also produces population estimates for these universes: resident plus armed forces overseas, civilian, civilian non-institutionalized at the national level, and civilian at the state level. The reference date for estimates is July 1. Estimates usually are for the present and the past, while [projections](#) are estimates of the population for future dates.

The program develops these estimates with the assistance of the [Federal State Cooperative Program for Population Estimates \(FSCPE\)](#). These estimates are used in federal funding allocations, as denominators for vital rates and per capita time series, as survey controls, and in monitoring recent demographic changes. With each new issue of July 1 estimates, revisions are made to estimates for years back to the last census. Previously published estimates are superseded and archived.

The Population Estimates are also available on [American Factfinder](#).

Broadband Indicator Data

Gadberry's Broadband Served Indicator Data provides demographic data specifically designed to satisfy the requirements of the Broadband Initiative Program, as a part of the American Recovery and Reinvestment Act of 2009.

The Broadband Indicator is created using self-reported consumer information including Internet registrations, survey cards, online surveys, registrations and marketing solicitations data. The source data is compiled monthly by the provider, and the Broadband Indicator is constructed quarterly. The current sample size is over 20 million household records containing information indicating broadband use.

³ High-Speed Services for Internet Access: Status as of June 30, 2008 www.fcc.gov/wcb/stats

Take Rate Methodology

We began by quantifying the total number of households *with access* to broadband services. Using the broadband in-use data described above, census blocks with reported active broadband subscribers were identified, as well as the number of occupied household units in each block for 2008. When totaled, the number of households in these census blocks provided the number of homes *passed by broadband* services. There were no efforts to determine the type of technology, pricing or speed available.

Armed with this information, the number of active broadband *residential lines* for each state (as per the FCC report) was divided by the total households in the active BB census blocks. The result is an accurate penetration rate in the areas *where broadband services are known to be available*, as well as the census blocks where broadband is unavailable. Subtracting the total households with active broadband available from the total households for the state gave the final result of homes *without access* to broadband.

"Subtracting the total households with active broadband available from the total households for the state gave the final result of homes *without access* to broadband."

While most will agree that many states have large geographic areas with no access to broadband services, examining the data in the table below reveals that the percentage of households without access is smaller than many estimated. Much of this variance is due to sociological behaviors and patterns of settlement over time.

The census block, from a geographic standpoint, will vary in size based on population (and subsequently households). In sparsely populated areas, a census block may contain a large land area but represent very few households. In a metropolitan area, on the other hand, a census block may be no larger than a city block but include many homes and/or multi-family dwelling units. So, even though it may appear on a map that large areas of a state lack access to broadband, the number and percentage of households might be small in comparison to the land area.

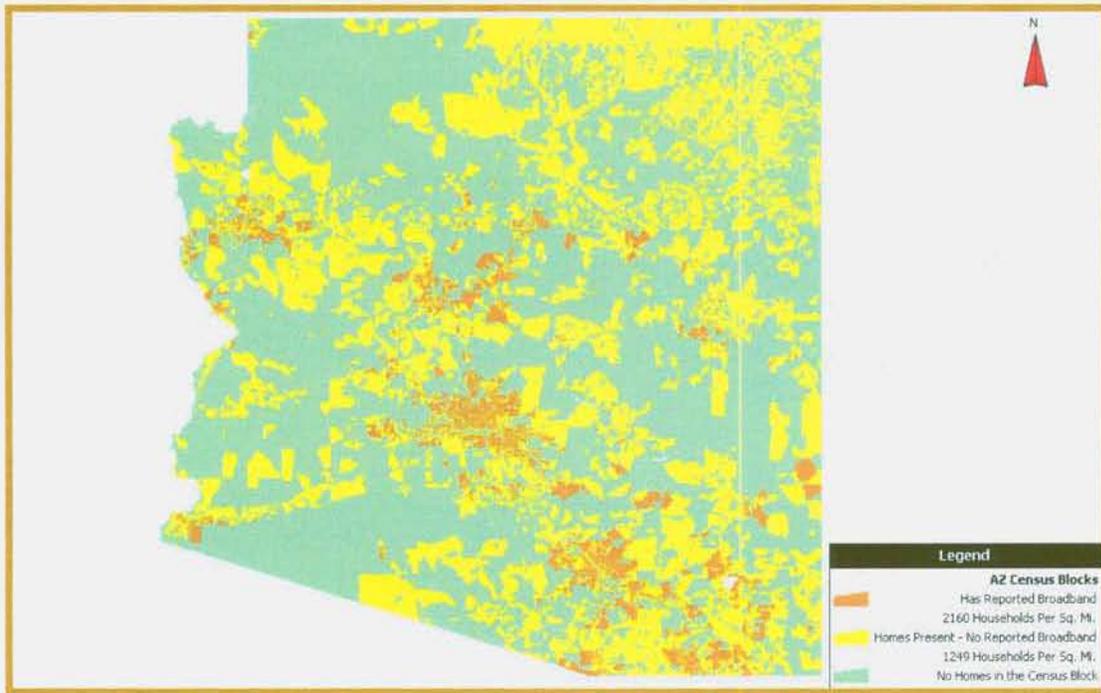


Figure 1: Arizona Broadband Classified Census Blocks

The image above for the state of Arizona shows a large amount of land area without reported broadband use. Yet, Arizona has a 75.13% adoption rate where broadband services are available. The take rate averaged over the whole state is 57.86%. Only 22.99% of the homes statewide do not have access to broadband.

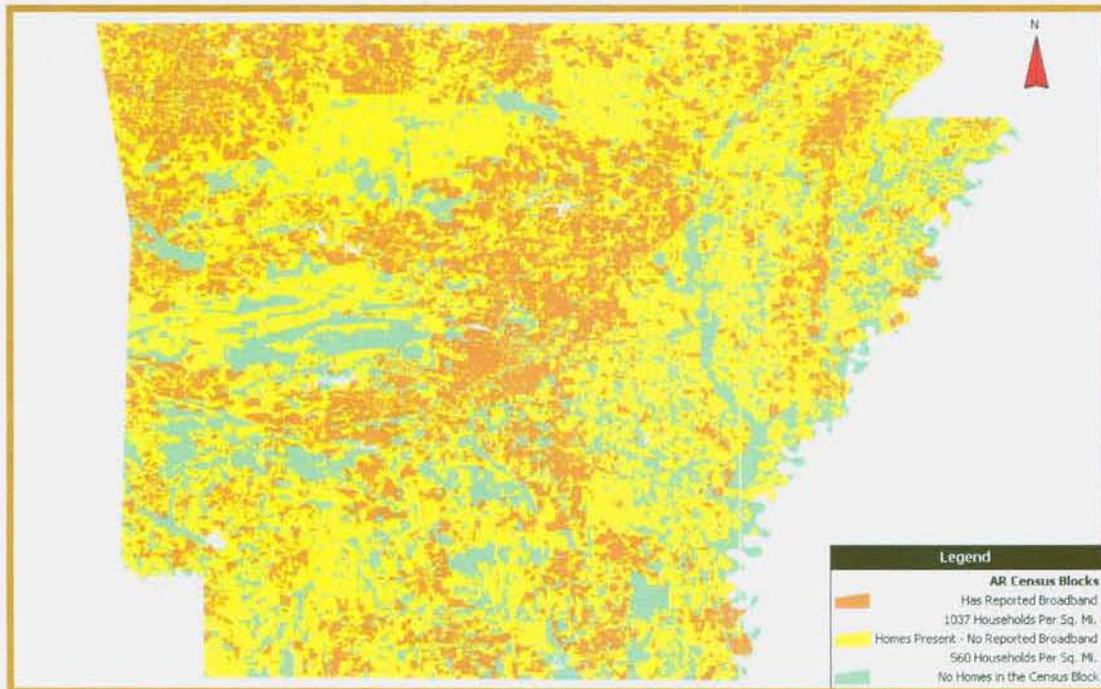


Figure 2: Arkansas Broadband Classified Census Blocks

State	Homes July 2008	2008 Broadband Res Lines	2008 Res Take Rate Statewide	Households with BB Available	Take Rate Where BB is Available	Difference Available to Statewide	Number of Homes Without Access to BB	% Homes without BB Access
AK	283,357	156,793	55.33%	175,379	89.40%	34.07%	107,978	38.11%
AL	2,158,576	909,945	42.15%	1,633,780	55.70%	13.54%	524,796	24.31%
AR	1,298,137	612,182	47.16%	927,961	65.97%	18.81%	370,176	28.52%
AZ	2,722,725	1,575,252	57.86%	2,096,738	75.13%	17.27%	625,987	22.99%
CA	13,393,878	10,406,479	77.70%	12,018,850	86.58%	8.89%	1,375,028	10.27%
CO	2,152,040	1,315,361	61.12%	1,743,132	75.46%	14.34%	408,908	19.00%
CT	1,443,115	1,135,798	78.70%	1,360,979	83.45%	4.75%	82,136	5.69%
DC	285,353	191,505	67.11%	243,435	78.67%	11.56%	41,918	14.69%
DE	392,965	240,153	61.11%	320,355	74.96%	13.85%	72,610	18.48%
FL	8,800,294	5,425,497	61.65%	7,120,733	76.19%	14.54%	1,679,561	19.09%
GA	4,026,082	2,402,283	59.67%	3,263,180	73.62%	13.95%	762,902	18.95%
HI	512,881	378,477	73.79%	394,369	95.97%	22.18%	118,512	23.11%
IA	1,329,352	632,294	47.56%	979,854	64.53%	16.97%	349,498	26.29%
ID	641,479	343,184	53.50%	454,827	75.45%	21.95%	186,652	29.10%
IL	5,276,979	3,471,815	65.79%	4,383,916	79.19%	13.40%	893,063	16.92%
IN	2,795,024	1,274,862	45.61%	2,207,438	57.75%	12.14%	587,586	21.02%
KS	1,226,859	721,808	58.83%	922,683	78.23%	19.40%	304,176	24.79%
KY	1,920,581	932,158	48.54%	1,531,031	60.88%	12.35%	389,550	20.28%
LA	1,883,167	1,111,304	59.01%	1,585,612	70.09%	11.07%	297,555	15.80%
MA	2,735,443	1,946,046	71.14%	2,491,976	78.09%	6.95%	243,467	8.90%
MD	2,333,064	1,767,213	75.75%	2,097,156	84.27%	8.52%	235,908	10.11%
ME	700,480	309,458	44.18%	463,399	66.78%	22.60%	237,081	33.85%
MI	4,535,323	2,262,822	49.89%	3,664,400	61.75%	11.86%	870,923	19.20%
MN	2,331,619	1,288,882	55.28%	1,811,539	71.15%	15.87%	520,080	22.31%
MO	2,663,977	1,496,075	56.16%	2,010,489	74.41%	18.25%	653,488	24.53%
MS	1,267,231	435,193	34.34%	931,606	46.71%	12.37%	335,625	26.48%
MT	438,282	198,534	45.30%	269,742	73.60%	28.30%	168,540	38.45%
NC	4,201,378	2,280,220	54.27%	3,386,502	67.33%	13.06%	814,876	19.40%
ND	313,332	145,593	46.47%	188,651	77.18%	30.71%	124,681	39.79%
NE	786,334	431,124	54.83%	562,337	76.67%	21.84%	223,997	28.49%
NH	597,129	363,328	60.85%	471,599	77.04%	16.20%	125,530	21.02%
NJ	3,517,293	2,716,982	77.25%	3,133,802	86.70%	9.45%	383,491	10.90%
NM	871,700	374,043	42.91%	564,196	66.30%	23.39%	307,504	35.28%
NV	1,127,061	780,141	69.22%	915,596	85.21%	15.99%	211,465	18.76%
NY	7,977,286	5,470,914	68.58%	6,988,378	78.29%	9.70%	988,908	12.40%
OH	5,079,873	2,838,688	55.88%	4,391,866	64.64%	8.75%	688,007	13.54%
OK	1,637,138	880,666	53.79%	1,154,522	76.28%	22.49%	482,616	29.48%
OR	1,628,826	1,081,837	66.42%	1,331,670	81.24%	14.82%	297,156	18.24%
PA	5,496,336	3,097,119	56.35%	4,563,812	67.86%	11.51%	932,524	16.97%
RI	451,753	297,643	65.89%	411,553	72.32%	6.44%	40,200	8.90%
SC	2,056,127	942,688	45.85%	1,578,466	59.72%	13.87%	477,661	23.23%
SD	361,482	170,380	47.13%	227,352	74.94%	27.81%	134,130	37.11%
TN	2,758,171	1,346,820	48.83%	2,327,985	57.85%	9.02%	430,186	15.60%
TX	9,598,579	6,198,779	64.58%	7,845,124	79.01%	14.43%	1,753,455	18.27%
UT	944,347	552,567	58.51%	774,276	71.37%	12.85%	170,071	18.01%
VA	3,306,389	1,900,624	57.48%	2,815,194	67.51%	10.03%	491,195	14.86%
VT	312,617	136,780	43.75%	205,400	66.59%	22.84%	107,217	34.30%
WA	2,791,597	1,783,539	63.89%	2,344,684	76.07%	12.18%	446,913	16.01%
WI	2,569,430	1,384,836	53.90%	2,041,611	67.83%	13.93%	527,819	20.54%
WV	886,430	314,072	35.43%	471,193	66.65%	31.22%	415,237	46.84%
WY	246,393	116,661	47.35%	146,697	79.53%	32.18%	99,696	40.46%
Totals	129,065,264	78,547,417	60.86%	105,947,025	72.90%	12.05%	23,118,239	17.91%

Table 1: Comparison of Broadband Take Rates by State

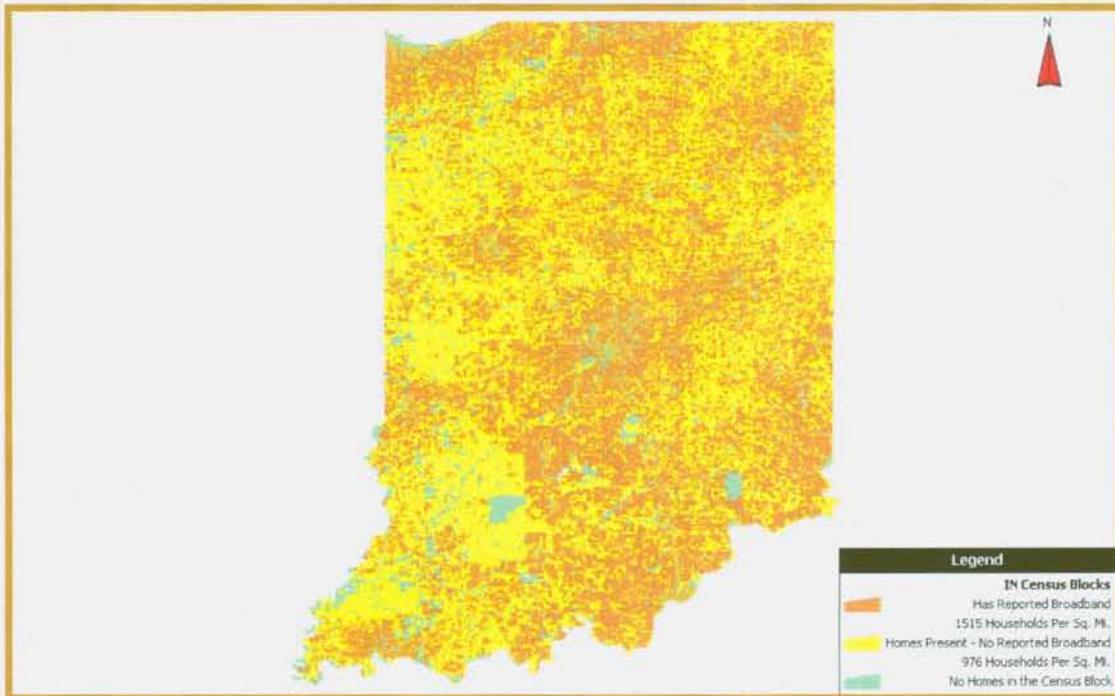


Figure 3: Indiana Broadband Classified Census Blocks

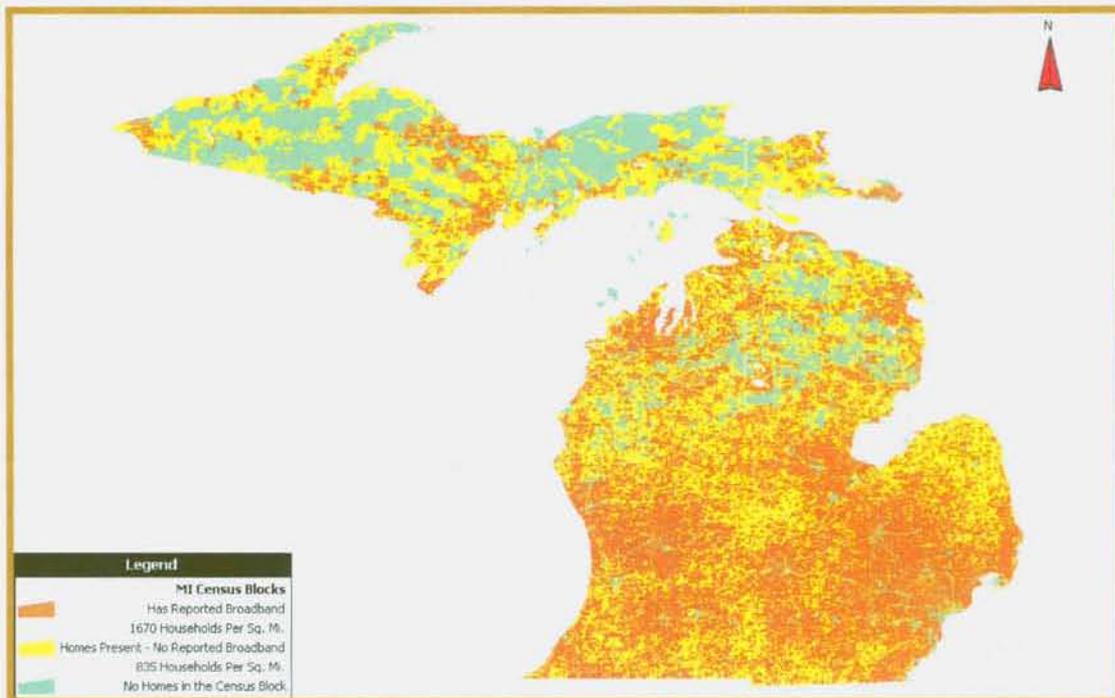


Figure 4: Michigan Broadband Classified Census Blocks

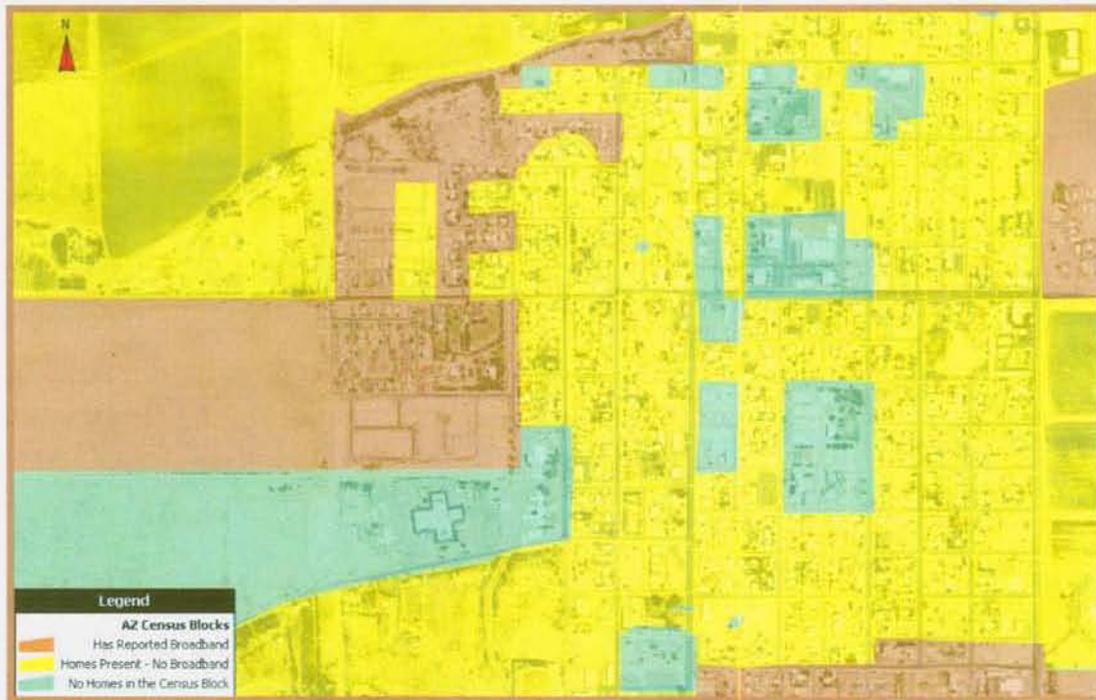


Figure 5: Aerial map of blocks with no access and occupied households.

Conclusion

Using the approach described in this document, the estimate of the national broadband adoption rate where services are available stands at 72.9%. The total number of homes with access to broadband is 105,947,025. The number of homes that *do not* have access to broadband is 23,118,239, which represents 17.91% of currently occupied homes (based on 2008 estimates). When compared to the current accepted industry estimates, the new approach results in a 10% increase in previously quoted adoption rates.

Based on these higher adoption rates, it is now possible to reevaluate additional broadband deployments or expansions to areas that might not have been considered financially sustainable previously, based on their low household density per square mile. Armed with more accurate data and the ability to identify *exactly* where unserved homes are located allows for more informed deployment strategies, and possibly more served households.

Broadband Estimates Calculated with New, More Accurate Metrics

- National broadband adoption rate where services are available: **72.9%**
- Total number of homes with access to broadband: **105,947,025**
- Number of homes without access to broadband: **23,118,239**
- Percentage of homes without access to broadband: **17.91%**

Purpose of Brief

This brief is not intended to go into high-level detail regarding speed, pricing or type of technology/topology deployed, nor is it intended to quantify the ranking of the US in worldwide broadband adoption rates. The Berkman Center recently published a report for the FCC with those details, available at http://www.fcc.gov/stage/pdf/Berkman_Center_Broadband_Study_13Oct09.pdf.

Rather, the primary focus of this brief is to identify the potential broadband market as a whole. Take rate statistics have a major impact in forecasting the financial viability and sustainability for private sector broadband networks. To date, most models assume a much lower adoption rate, which could make a difference in decisions to deploy broadband in the remaining unserved markets.

About Brian Webster Consulting

Brian Webster Consulting and wirelessmapping.com were created to fill a need for affordable wireless engineering services for those unable to justify the cost of hiring and maintaining fulltime RF Engineering staff. Projects are approached with a creative eye, cost-conscious methodology and nearly 20 years of industry experience. The integration of Geographic Information Systems (GIS) helps present complex engineering and demographic information in clear, color diagrams that help the end user make actionable business decisions. These capabilities allow demographic data and market analysis information to be included as overlays to a client's engineering diagrams, along with raw data for input to financial models.

Brian has extensive experience in municipal wireless (Muni) network design. Most recently, he was an RF Engineering Manager at EarthLink and was responsible for designing the [City of Philadelphia's](http://City of Philadelphia) municipal wireless network, one of the world's largest wireless mesh deployments. His responsibilities included reviewing and approving the work of EarthLink engineers and Motorola contractors.
<http://www.wirelessmapping.com/>

About The Gadberry Group

The Gadberry Group provides location-based services and information data products for clients who demand the most current, accurate and precise household and population data for their site location analysis. MicroBuild®, Gadberry's patent-pending product, is unique because only MicroBuild® uses consumer data at the rooftop level to deliver quarterly household and population counts beginning at the census block level.
<http://www.gadberry.net/>

Addendum – 12/18/09

After publishing this report additional data relative to the FCC Report was discovered:

First, the total households stated for each state were total housing units and not occupied housing units. The households passed figures were of occupied households. It is only proper to compare the same on the statewide basis. This would have actually increased the take rate had the occupied housing units totals been used. This error is corrected in the modified data table.

Second and most important, in the FCC Report to Congress "High Speed Services for Internet Access: Status as of June 30, 2008", the total number of residential lines reported included data from the mobile wireless broadband operators (Cellular and PCS carriers). In a separate report and order #08-89 released by the FCC, it is stated that the wireless mobile broadband carriers had reported the number of **data capable handsets**, not the number of **customers that actually subscribed to data or Internet plans**. Upon other research through industry sources, it was discovered that less than 3% of the mobile broadband subscribers use said service as their sole connection to the Internet. The residential lines reported by the mobile wireless carriers represent **14.5%** of the **total lines** stated in the FCC report.

Knowing this information a decision was made to reduce the number of reported residential lines in each state by 14.5% and run new take rate calculations. There were no breakdowns of the mobile wireless subscribers by state; the reduction was applied evenly over all states. In the new table a lower total of residential high-speed lines is reported as compared to the original study data.

As an additional point of study, a confidence level for each census block was determined. On a state-by-state basis those census blocks that had only one or two respondent data points were separated and noted as low confidence. Using that method, separate high confidence columns have been added to the report. The high confidence columns are those census blocks with three or more separate consumer reports of broadband activity.

STATE	Occupied Households July 2008	2008 Residential Lines minus mobile wireless	2008 Statewide Res Take Rate	Households with BB Available	Households with BB Available High confidence	Take Rate Where BB is Available	Take Rate Where Available High Confidence	Number of Households Without Access to BB	Number of Households without Access to BB High Confidence	% Households without BB Access	% Households without BB Access High Confidence
AK	237,034	134,058	56.56%	175,379	146,376	76.44%	91.58%	61,655	90,658	26.01%	38.25%
AL	1,938,130	778,003	40.14%	1,633,780	1,221,322	47.62%	63.70%	304,350	716,808	15.70%	36.98%
AR	1,175,023	523,416	44.55%	927,961	660,774	56.40%	79.21%	247,062	514,249	21.03%	43.77%
AZ	2,336,959	1,346,840	57.63%	2,096,738	1,841,745	64.24%	73.13%	240,221	495,214	10.28%	21.19%
CA	12,764,753	8,897,540	69.70%	12,018,850	10,655,512	74.03%	83.50%	745,903	2,109,241	5.84%	16.52%
CO	1,959,789	1,124,634	57.39%	1,743,132	1,476,533	64.52%	76.17%	216,657	483,256	11.06%	24.66%
CT	1,405,509	971,107	69.09%	1,360,979	1,235,433	71.35%	78.60%	44,530	170,076	3.17%	12.10%
DC	256,110	163,737	63.93%	243,435	210,330	67.26%	77.85%	12,675	45,780	4.95%	17.88%
DE	343,554	205,331	59.77%	320,355	277,498	64.09%	73.99%	23,199	66,056	6.75%	19.23%
FL	7,628,143	4,638,800	60.81%	7,120,733	6,171,291	65.14%	75.17%	507,410	1,456,852	6.65%	19.10%
GA	3,652,043	2,053,952	56.24%	3,263,180	2,780,748	62.94%	73.86%	388,863	871,295	10.65%	23.86%
HI	436,273	323,598	74.17%	394,369	369,281	82.05%	87.63%	41,904	66,992	9.60%	15.36%
IA	1,247,553	540,611	43.33%	979,854	677,745	55.17%	79.77%	267,699	569,808	21.46%	45.67%
ID	562,067	293,422	52.20%	454,827	344,356	64.51%	85.21%	107,240	217,711	19.08%	38.73%
IL	4,851,822	2,968,402	61.18%	4,383,916	3,662,089	67.71%	81.06%	467,906	1,189,733	9.64%	24.52%
IN	2,543,090	1,090,007	42.86%	2,207,438	1,706,453	49.38%	63.88%	335,652	836,637	13.20%	32.90%
KS	1,118,858	617,146	55.16%	922,683	698,027	66.89%	88.41%	196,175	420,831	17.53%	37.61%
KY	1,762,321	796,995	45.22%	1,531,031	1,246,235	52.06%	63.95%	231,290	516,086	13.12%	29.28%
LA	1,792,856	950,165	53.00%	1,585,612	1,262,178	59.92%	75.28%	207,244	530,678	11.56%	29.60%
MA	2,615,877	1,663,869	63.61%	2,491,976	2,171,845	66.77%	76.61%	123,901	444,032	4.74%	16.97%
MD	2,202,016	1,510,967	68.62%	2,097,156	1,905,568	72.05%	79.29%	104,860	296,448	4.76%	13.46%
ME	555,653	264,587	47.62%	463,399	345,519	57.10%	76.58%	92,254	210,134	16.60%	37.82%
MI	4,009,186	1,934,713	48.26%	3,664,400	3,049,933	52.80%	63.43%	344,786	959,253	8.60%	23.93%
MN	2,096,616	1,101,994	52.56%	1,811,539	1,444,866	60.83%	76.27%	285,077	651,750	13.60%	31.09%
MO	2,387,051	1,279,144	53.59%	2,010,489	1,589,240	63.62%	80.49%	376,562	797,811	15.78%	33.42%
MS	1,165,764	372,090	31.92%	931,606	660,351	39.94%	56.35%	234,158	505,413	20.09%	43.35%
MT	394,719	169,747	43.00%	269,742	176,219	62.93%	96.33%	124,977	218,500	31.66%	55.36%
NC	3,756,683	1,949,588	51.90%	3,386,502	2,804,418	57.57%	69.52%	370,181	952,265	9.85%	25.35%
ND	275,615	124,482	45.17%	188,651	133,651	65.99%	93.14%	86,964	141,964	31.55%	51.51%
NE	730,577	368,611	50.45%	562,337	414,182	65.55%	89.00%	168,240	316,395	23.03%	43.31%
NH	523,124	310,645	59.38%	471,599	394,238	65.87%	78.80%	51,525	128,886	9.85%	24.64%
NJ	3,284,958	2,323,020	70.72%	3,133,802	2,716,460	74.13%	85.52%	151,156	568,498	4.60%	17.31%
NM	764,708	319,807	41.82%	564,196	414,933	56.68%	77.07%	200,512	349,775	26.22%	45.74%
NV	994,992	667,021	67.04%	915,596	831,605	72.85%	80.21%	79,396	163,387	7.98%	16.42%
NY	7,336,803	4,677,631	63.76%	6,988,378	6,332,820	66.93%	73.86%	348,425	1,003,983	4.75%	13.68%
OH	4,735,094	2,427,078	51.26%	4,391,866	3,778,138	55.26%	64.24%	343,228	956,956	7.25%	20.21%
OK	1,477,008	752,969	50.98%	1,154,522	890,260	65.22%	84.58%	322,486	586,748	21.83%	39.73%
OR	1,516,658	924,971	60.99%	1,331,670	1,082,391	69.46%	85.46%	184,988	434,267	12.20%	28.63%
PA	5,062,337	2,648,037	52.31%	4,563,812	3,758,275	58.02%	70.46%	498,525	1,304,062	9.85%	25.76%
RI	432,696	254,485	58.81%	411,553	345,384	61.84%	73.68%	21,143	87,312	4.89%	20.18%
SC	1,825,000	805,998	44.16%	1,578,466	1,232,290	51.06%	65.41%	246,534	592,710	13.51%	32.48%
SD	317,343	145,675	45.90%	227,352	156,285	64.07%	93.21%	89,991	161,058	28.36%	50.75%
TN	2,556,644	1,151,531	45.04%	2,327,985	1,927,177	49.46%	59.75%	228,659	629,467	8.94%	24.62%
TX	8,924,973	5,299,956	59.38%	7,845,124	6,478,688	67.56%	81.81%	1,079,849	2,446,285	12.10%	27.41%
UT	857,504	472,445	55.10%	774,276	665,293	61.02%	71.01%	83,228	192,211	9.71%	22.42%
VA	3,093,328	1,625,034	52.53%	2,815,194	2,459,003	57.72%	66.09%	278,134	634,325	8.99%	20.51%
VT	253,271	116,947	46.17%	205,400	147,573	56.94%	79.25%	47,871	105,698	18.90%	41.73%
WA	2,581,680	1,524,926	59.07%	2,344,684	1,981,047	65.04%	76.98%	236,996	600,633	9.18%	23.27%
WI	2,291,855	1,184,035	51.66%	2,041,611	1,626,833	58.00%	72.78%	250,244	665,022	10.92%	29.02%
WV	757,767	268,532	35.44%	471,193	354,317	56.99%	75.79%	286,574	403,450	37.82%	53.24%
WY	215,923	99,745	46.19%	146,697	92,839	67.99%	107.44%	69,226	123,084	32.06%	57.00%
Totals	118,005,310	67,158,042	56.91%	105,947,025	89,005,567	63.39%	75.45%	12,058,285	28,999,743	10.22%	24.57%

Table 2 – Modified Comparison of Broadband Take Rates by State