



OF THE CENTRAL CAROLINAS, INC.

A United Way Agency

Chairman Julius Genachowski
Commissioner Meredith Attwell Baker
Commissioner Mignon Clyburn
Commissioner Michael J. Copps
Commissioner Robert M. McDowell

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: GN Docket No. 09-191

January 11, 2010

Dear Chairman Genachowski and Commissioners:

In the Charlotte region, we are well-acquainted with both the positive and the challenging aspects of the American economic model. As one of the leading financial centers, we have seen how private investment can stimulate economic and community growth. Yet we also see, in stark focus, the gap between the "haves" and the "have nots." And that is where the Urban League of Central Carolinas comes in.

We are a multi-service, non-profit agency, focused on promoting financial stability among African-American families and others, and racial inclusion in our community. We serve persons from all economic levels - from area professionals to those living in designated "fragile" and "at risk" neighborhoods - through an assortment of programs that include education, skills training, career development, employment services, and youth initiatives.

It is increasingly obvious that broadband internet access is mandatory if African Americans are to fully secure economic self-reliance, parity, power and civil rights in today's online, information-based and technology-intense society. That is why we are encouraged by the attention and work the Federal Communications Commission is devoting to your proceeding on universal broadband. However, we are also concerned that the Open Internet Notice of Proposed Rulemaking (NPRM) not only draws energy from those efforts, but could actually hinder them by discouraging investment by private companies in expanding and improving access. This could limit the benefits of broadband technology - in education, telemedicine, distance learning, etc - to the wealthy and well-connected, potentially leaving behind many for whom we speak in our community.

Education

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Training

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Placement

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Dignity

I was not surprised to learn of a recent report from the Pew Internet & American Life Project, which found that only 44% of African Americans have a home broadband connection, while 63% of white Americans do. While I agree that there may be other factors beyond just the availability of broadband service, such as personal ownership of computers or recognition of the importance and benefits of a broadband connection, the fact is that there is a broadband barrier in front of the African American community and we need to be working together to break it down.

Adding new government regulation, especially in an industry such as wireless, creates business uncertainty, which has a chilling effect on investment, as the financial sectors continues to teach us.

I am also concerned about the potential impact of proposed regulations on those consumers most recently coming "online." It makes sense to me that those who use more of a product should pay more. For example, if I limit watering my lawn to once a week, my water bill should not go up to subsidize the habits of the exclusive golf club which waters 36 holes daily. Yet the digital parallel to that scenario would play out under the proposed rules. Internet providers should be allowed the flexibility to assure that prices are fair and appropriate to both individual consumers and large companies who stream pay-per-view movies over the internet. Even an incremental increase in cost in these economic times could jeopardize access for many of my constituents and thus the potential benefits.

Mr. Chairman, it is clear that broadband service is less a luxury and more of a necessity every day. Our goal as a country – as the Administration has already articulated – should be broadband adoption and access for all. Every proposal impacting communications policy should be considered based on whether it helps us achieve that end. Current policies have moved us from 10 broadband providers nationwide in December 1999 to 1,395 in June 2008, according to the FCC's most recent "High-speed Services for Internet Access" report. There is much to be done in working to deliver the opportunity and equality of broadband to all citizens. But I have not yet seen a compelling reason to put at risk the private capital needed to accomplish it.

As you move forward with the Open Internet case, I would urge caution and careful consideration so as to not lose sight of what is the most pressing goal: availability and adoption of broadband by all citizens.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick C. Graham", with a long horizontal flourish extending to the right.

Dr. Patrick C. Graham
President and CEO