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May 28, 2010

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Ex Parte Submission: GN Docket No. 09-51 -- OBI Technical Paper 1

Dear Ms. Dortch:

ADTRAN, Inc. (“ADTRAN”) is concerned that the technical and economic model used to derive the broadband availability gap in the National Broadband Plan may be flawed. ADTRAN has had some informal discussions with Commission staff yesterday to better understand the assumptions and calculations used in the model. Attached is a technical memo that describes in greater detail ADTRAN’s concerns with some of the assumptions/calculations used in the model that could affect determinations of the relative efficiency of wireless and wireline solutions for providing broadband access.

ADTRAN is submitting this technical memo into the record to ensure that the evolving National Broadband Plan incorporates the most accurate information possible. Moreover, to the extent the Commission may use its model for other purposes (for example, to determine maximum broadband subsidies under a “reverse auction” process), it is critical that the model be corrected.

In accordance with Section 1.1206 of the Commission’s Rules, a copy of this notice is being filed via the Electronic Comment Filing System in the docket for the above-captioned proceeding. Please contact the undersigned if you have any questions with regard to this matter.

Sincerely,

/s/

Stephen L. Goodman
Counsel for ADTRAN, Inc.

cc: Rohit Dixit

June 9, 2010
Marlene H. Dortch

Your submission has been accepted

ECFS Filing Receipt - Confirmation number: 2010528853839 Proceeding

Name	Subject
09-51	In the matter of a National Broadband Plan for Our Future.

Contact Info

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Details

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Document(s)

File Name	Custom Description	Size
Ex Parte for Criticism of FCC Model 5-28-10.doc	Cover Letter	132 KB
Technical Memo on OBI 1 5-28-10.doc	Technical Memo	94 KB
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