

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

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In the Matter of)	
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Connect America Fund)	WC Docket No. 10-90
)	
A National Broadband Plan for Our Future)	GN Docket No. 09-51
)	
High-Cost Universal Service Support)	WC Docket No. 05-337
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COMMENTS OF TECHAMERICA

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TechAmerica hereby submits these comments to the Federal Communications Commission (“Commission”) in regard to the Commission’s Notice of Inquiry concerning its creation of a Connect America Fund (“CAF”) and the reformation of High-Cost Universal Service support (“High-Cost NOI”).¹ TechAmerica’s members support ubiquitous broadband deployment in the United States. TechAmerica, therefore, is pleased to be able to file comments on their behalf in this proceeding.

TechAmerica is the leading voice for the U.S. technology industry, which is the driving force behind productivity growth and jobs creation in the United States and the foundation for the global innovation economy. Representing approximately 1,200 member companies of all sizes from the public and commercial sectors of the economy, TechAmerica is the industry’s largest advocacy organization and is dedicated to helping members’ top and bottom lines. It is also the technology industry’s only grassroots-to-global advocacy network, with offices in state capitals around the United States, Washington, D.C., Europe (Brussels), and Asia (Beijing). TechAmerica was formed by the merger of the American Electronics Association (AeA), the Cyber Security Industry Alliance (CSIA), the Information Technology Association of America (ITAA), and the Government Electronics and Information Association (GEIA).

TechAmerica’s members include: manufacturers and suppliers of broadband networks and equipment; consumer electronics companies; ICT hardware companies; software and application providers; systems integrators; Internet and e-commerce companies; Internet service providers; information technology government contractors; and information technology consulting and sourcing companies.

¹ *Connect America Fund, A National Broadband Plan for Our Future, High-Cost Universal Service Support*, Notice of Inquiry and Notice of Proposed Rulemaking, 75 Fed. Reg. 26906 (May 13, 2010) (“High-Cost NOI”).

TechAmerica welcomes this opportunity to provide the Commission with a viewpoint shared by such a diverse membership.

The Connect America Fund Should Be Technology-Agnostic and Flexible

TechAmerica applauds the Commission for determining that the Universal Service Fund (“USF”), as currently constituted, is woefully inadequate for ensuring all Americans have access to broadband Internet service. The Commission’s recommendation for a CAF is arguably one of the most important recommendations made in the National Broadband Plan (“NBP”), and TechAmerica looks forward to providing further input to the Commission as the CAF is developed.

In its High-Cost NOI, the Commission seeks comment on what technology platforms should be included in a forward-looking cost model.² Inherent in this discussion is the Commission’s respect for competitive neutrality, which TechAmerica fully supports. Indeed, assuming a forward-looking cost model is deployed, the Commission should adhere to the NBP’s recommendation that support be made available to all broadband access providers, including incumbent and competitive telephone companies, fixed and wireless providers, satellite providers, and other broadband providers.³

Additionally, the Commission, consistent with its previously stated opinion that eligibility for CAF support be technology-agnostic, seeks comment as to which technologies should be considered when estimating costs for model development.⁴ Put

² High-Cost NOI ¶ 24.

³ Federal Communications Commission, *Connecting America: The National Broadband Plan*, 145 (rel. Mar. 16, 2010).

⁴ *Id.* ¶ 25.

simply, the Commission should develop a model that takes into account the costs of all technologies currently used (and those soon to be used) to offer voice and broadband service that meets the national broadband availability target. Doing so will ensure that the CAF is flexible enough to accommodate not only the needs of consumers, but also the innovative and cost-effective technologies that are currently deployed. In this vein, the Commission should also seek to incorporate into the CAF support mechanism the ability to adjust the cost models accordingly from time to time to account for technological evolution in the deployment of broadband Internet access.

Target Support to Community Anchor Institutions and “Middle Mile” Projects

Throughout the High-Cost NOI, the Commission emphasizes the need to contain the CAF’s costs and efficiently enhance its impact. TechAmerica wholly supports this goal. Thus, TechAmerica believes that the Commission, whether during an “expedited process” for providing funding to extend networks in unserved areas⁵ or upon the completion of final rules to implement fully the CAF, should target support towards traditional “anchor” institutions such as schools, libraries, community centers, and hospitals. Anchor institutions can and do play a vital role in driving greater broadband deployment. Build-out of fixed, very high capacity “middle mile” connections to “anchor” institutions will allow local wireless and fixed providers to build off these networks to reach homes and businesses in a community. Targeting support towards such institutions will provide the most “bang for the buck” and help to contain the size of the CAF while expediting the deployment of broadband to unserved areas.

⁵ See High-Cost NOI ¶ 43.

Conclusion

TechAmerica thanks the Commission for embarking on reform of the USF via the CAF, and it looks forward to working with the Commission further on this vitally important policy endeavor.