

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

In the Matter of	)	
	)	
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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Comcast Corporation (“Comcast”) submits these comments in response to the Notice of Inquiry (“*NOI*”) and Notice of Proposed Rulemaking (“*NPRM*”) issued by the Federal Communications Commission (“FCC” or “Commission”) in the above-captioned proceeding, seeking comment on how best to: (1) determine the universal service support levels needed to ensure deployment of broadband networks in unserved areas; (2) target universal support funding; and (3) cap growth and reduce inefficiency in legacy high-cost support mechanisms.<sup>1</sup>

**I. INTRODUCTION AND SUMMARY**

Comcast supports the FCC’s efforts to control the size of the high-cost federal Universal Service Fund (“USF” or “Fund”) and to revise the current support mechanisms to promote the deployment of broadband to unserved areas. In pursuing these laudable goals, the Commission should: (1) first cap and then reduce the size of the high-cost fund; and (2) shift subsidies currently used to support narrowband facilities and services to support the extension of broadband infrastructure to unserved areas. In short, the

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<sup>1</sup> *Connect America Fund; A National Broadband Plan for Our Future; High-Cost Universal Service Support*, Notice of Inquiry and Notice of Proposed Rulemaking, 25 FCC Rcd 6657 (2010) (FCC 10-58) (“*NOI*” or “*NPRM*”).

Commission should focus its efforts on supporting broadband deployment while also reducing the substantial burden that USF contributions currently impose on voice providers and the consumers they serve.

The *NPRM* identifies a series of initiatives that the FCC could undertake to reform or eliminate existing high-cost funding mechanisms that clearly have outlived their usefulness in a broadband world. Comcast supports the prompt implementation of the measures proposed in the *NPRM*. The Commission, however, should not simply reallocate revenues from the current high-cost program to the Connect America Fund (“CAF”). Rather, the FCC should apply a meaningful portion of the savings from USF reform to reduce the overall size of the high-cost fund and the related burden on consumers.

Moreover, the FCC also should actively explore other methods for reducing the size of the Fund without compromising the Commission’s commitment to universally available voice and, ultimately, broadband service. For example, the Commission should consider the proposal advanced by the National Cable & Telecommunications Association (“NCTA”) in its November 2009 petition for rulemaking, suggesting that the FCC identify geographic areas where voice service can be provided ubiquitously without subsidies and eliminate unnecessary support in those areas.<sup>2</sup>

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<sup>2</sup> National Cable & Telecommunications Association, *Reducing Universal Service Support in Geographic Areas that are Experiencing Unsupported Facilities-Based Competition*, WC Docket No. 05-337, Petition for Rulemaking at 9 (Nov. 5, 2009) (“NCTA Petition”); *Comment Sought on the National Cable & Telecommunications Association Petition for Rulemaking to Reduce Universal Service High-Cost Support Provided to Carriers in Areas Where There is Extensive Unsubsidized Facilities-Based Voice Competition*, Public Notice, 24 FCC Rcd 14394 (2009); see also *Applications Filed by Frontier Communications Corporation and Verizon Communications Inc. for Assignment or Transfer of Control*, WC Docket No. 09-95, Memorandum Opinion and

The *NOI* seeks comment on the potential utility of the National Broadband Plan (“NBP”) model in assessing the support needed for broadband deployment. The NBP model developed by FCC staff is very comprehensive and appears to do a thorough job of analyzing the difficult issue of how much support is needed to implement the NBP’s goal of closing the broadband availability gap. As noted in the discussion below, it is difficult to provide detailed comments about the model unless the Commission provides private parties the ability to run the model themselves. Based on what Comcast has been able to glean thus far, however, it appears that certain adjustments would make the model a more useful tool for determining the actual investment needed to expand broadband services to unserved areas and, perhaps, assist the Commission as it moves forward on other aspects of USF reform.

## **II. THE COMMISSION SHOULD CUT INEFFICIENCIES IN THE HIGH-COST PROGRAM AS PART OF ITS COMPREHENSIVE EFFORTS TO REFORM THE UNIVERSAL SERVICE FUND**

The Commission’s *NPRM* includes several proposals aimed at controlling the size of the high-cost program. As explained below, Comcast supports the adoption of virtually all of these proposals and urges the Commission to consider additional measures that would advance the Commission’s efforts to eliminate the broadband availability gap, while reducing the burden on voice providers and the consumers they serve.

### **A. Capping Legacy High-Cost Support**

As an initial step toward comprehensive reform of the high-cost USF program, the FCC should cap legacy high-cost support at existing levels, as proposed in the

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Order, FCC 10-87, Appendix C at 32 (rel. May 21, 2010) (requiring Frontier to target any new broadband universal service funding to areas not served by competitors).

*NPRM*.<sup>3</sup> There is credible evidence in the record demonstrating that the support levels today are significantly higher than necessary to meet the goals of the FCC's current universal service program. For example, NCTA has shown that in many cases, incumbent local exchange carriers ("LECs") are receiving high-cost support to offer service in areas that are also served by facilities-based VoIP providers that do not receive any government subsidies.<sup>4</sup> The presence of these non-subsidized, facilities-based competitors demonstrates that service would be available today in these overlapping areas, at reasonable rates, even without USF support.<sup>5</sup> In addition, ongoing technological advances, such as improvements in fixed wireless and other alternative technologies, including broadband satellite, innovations in the electronics used with transmission facilities and the use of IP-based technologies, as well as intensifying competition, should continue to put downward pressure on the costs to serve sparsely populated areas, further reducing the need for high-cost support in the future.

#### **B. Freezing Per-Line Support**

One of the principal reasons that the high-cost fund has continued to grow even as incumbent LECs have lost customers to competing providers is that the current mechanism provides support based on an incumbent's total loop costs – which are fixed – averaged over the number of lines the incumbent LEC has in service. Consequently, when an incumbent loses customers to a competitor, it does not experience a reduction in the total amount of support it receives from the USF. Rather, the amount of support the incumbent LEC receives for each remaining line in service increases to keep the total

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<sup>3</sup> *NPRM* ¶¶ 51-52.

<sup>4</sup> NCTA Petition at 6-8.

<sup>5</sup> *Id.* at 7-8.

amount of support constant.<sup>6</sup> Thus, the current mechanism largely shields recipients of high-cost loop support from competitive pressures by increasing per-line support to compensate for any losses to competitive providers.<sup>7</sup>

The Commission should eliminate the perverse economic effects of the existing system. Specifically, the FCC should ensure that the amount of high-cost loop support given to an incumbent LEC declines as the LEC's line count decreases. In addition, the Commission should cap the amount of per-line support that an incumbent LEC receives in a study area at 2009 or 2010 levels, unless the incumbent can demonstrate that its line costs are increasing over time (an unlikely possibility given the ongoing improvements in telecommunications technology and carrier productivity).

### **C.     Reevaluating the Need for Interstate Access Support**

Comcast fully supports the *NPRM's* suggestion that the Commission re-examine the need for the Interstate Access Support ("IAS") component of the high-cost fund to determine whether the program has outlived its usefulness.<sup>8</sup> This subsidy was established initially in 2000 to convert the "implicit subsidies" of the interstate carrier common line and presubscribed interexchange carrier charges to explicit support payments.<sup>9</sup> Although the Commission committed in that 2000 order to reevaluate the subsidy in five years to

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<sup>6</sup> *See id.* at 9.

<sup>7</sup> *See id.* at 9-10; *NPRM* ¶¶ 55-56.

<sup>8</sup> *NPRM* ¶¶ 57-58; *see also* FCC, "Connecting America: The National Broadband Plan," at 147 (rel. March 16, 2010), *available at*: <<http://download.broadband.gov/plan/national-broadband-plan.pdf>> ("NBP" or "National Broadband Plan") (suggesting elimination of the IAS).

<sup>9</sup> *Access Charge Reform; Price Cap Performance Review for Local Exchange Carriers; Low-Volume Long-Distance Users; Federal-State Joint Board on Universal Service*, Sixth Report and Order, Report and Order, and Eleventh Report and Order, 15 FCC Rcd 12962, ¶¶ 195-96 (2000) ("*CALLS Order*").

ensure that the funding was “not excessive,” no such analysis was ever conducted.<sup>10</sup> As noted above, in view of the substantial marketplace changes that have occurred over the past decade, including the use of local telephone plant to offer a wide array of services in addition to basic voice as well as the emergence of competing providers of voice service that receive no subsidy at all, it is reasonable to anticipate that the size of the IAS fund – currently over \$450 million<sup>11</sup> – can be substantially reduced or eliminated without any adverse impact on the Commission’s universal service objectives. Comcast urges the Commission to complete this long-overdue review of the IAS program expeditiously so that unnecessary subsidies can be eliminated.

**D. Eliminating High-Cost Support for Competitive Eligible Telecommunications Providers**

Comcast agrees with the recommendation of the National Broadband Plan that the FCC should phase out high-cost support for all competitive eligible telecommunications providers (“CETCs”) over time.<sup>12</sup> As the *NPRM* observes, Sprint and Verizon Wireless – two of the three largest recipients of wireless CETC subsidies<sup>13</sup> – have already

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<sup>10</sup> *CALLS Order* ¶ 203.

<sup>11</sup> National Broadband Plan at 147 (estimating that incumbent LECs received over \$450 million in IAS support in 2009 alone); Universal Service Administration Company, 2009 Annual Report 40 (2009), *available at* [http://www.usac.org/\\_res/documents/about/pdf/usac-annual-report-2009.pdf](http://www.usac.org/_res/documents/about/pdf/usac-annual-report-2009.pdf) (showing over \$560 million in IAS disbursements in 2009).

<sup>12</sup> National Broadband Plan at 147-48; *see also NPRM* ¶¶ 60-61.

<sup>13</sup> *See* Kevin W. Caves and Jeffrey A. Eisenach, *The Effects of Providing Universal Service Subsidies to Wireless Carriers*, attached to Letter from Jeffrey A. Eisenach, Chairman, Criterion Economics, LLC, to Marlene Dortch, FCC Secretary, CC Docket Nos. 96-45 and 05-337, at 18-19 (June 13, 2007) (“Eisenach Analysis”) (analyzing year 2006 data).

volunteered to phase out the high-cost funding they receive as CETCs.<sup>14</sup> The FCC should gradually eliminate funding for the remaining CETCs as well. The Commission should prescribe the pace of the annual reduction in each CETC's payments, but permit the individual carriers to determine how to implement the reduction.<sup>15</sup>

#### **E. Adopting Additional Reforms**

In addition to the reform measures suggested in the *NPRM*, the FCC should adopt additional changes to the existing high-cost subsidies that would reduce the sizable financial burden of the USF.<sup>16</sup> Recipients of USF support in recent years have been aggressively upgrading their networks to offer broadband services.<sup>17</sup> The current high-cost program, however, is designed to ensure the universal availability of narrowband, regulated voice services at reasonable prices. The Commission, thus, should overhaul the current subsidy program to recognize the reality that the network investments carriers make today using USF subsidies also enhance their ability to provide broadband services.

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<sup>14</sup> *NPRM* ¶ 59.

<sup>15</sup> *See id.* ¶ 61.

<sup>16</sup> *Id.* ¶ 62.

<sup>17</sup> *See, e.g.*, Windstream Corp., Annual Report (Form 10-K), at 7-8 (Feb. 24, 2010) (describing Windstream's "fully integrated communications network consist[ing] of IP routers, Ethernet switches, Asynchronous Transfer Mode (ATM) switches and frame relay switches capable of handling voice, data and dedicated circuits" and noting that "[i]n an effort to further develop enhanced services and bundled product offerings, the Company will continue to invest in its network to offer faster speeds in its high-speed Internet offerings."); Iowa Telecommunications Services Inc., Annual Report (Form 10-K), at 12-13 (Feb. 26, 2010) (describing network facility upgrades completed in recent years, including deploying DSL Internet access service to all of the company's exchanges; reducing analog carrier technology to less than one percent of total access lines; upgrading electronics on fiber network routes; and deploying gigabit Ethernet ("GigE") transport to serve approximately 70 locations); CenturyTel, Inc., Annual Report (Form 10-K), at 10 (March 1, 2010 (noting, *inter alia*, that approximately 89 percent of the company's access lines were broadband-enabled.).

Specifically, in determining the need for high-cost support, the FCC should take into account the fact that companies are able to provide both narrowband and broadband services over a single network and weigh the incumbent LEC's network costs against the revenues that the incumbent LEC is able to earn from both the data and voice services it provides over that network.<sup>18</sup> If the total revenues generated by the network are sufficient to offset the costs of providing service, there is no need for the Commission to provide a subsidy. Such an approach would be consistent with the FCC's goal of eliminating the funding of broadband-capable networks through legacy high-cost programs.<sup>19</sup>

The USF currently lacks any mechanism for adjusting support to account for revenues generated by broadband services. As a result, recipients of high-cost USF support can use the USF subsidies they receive to finance their broadband rollout while earning above-normal profits on the investments they make without having to justify continuation of their existing level of support (which is based solely on costs without consideration of revenues).

These concerns are not merely theoretical. Rural LECs have used high-cost support subsidies to upgrade their network infrastructures and used those upgraded networks to provide broadband services, all without risking any reduction in USF support.<sup>20</sup> The FCC should rectify this situation by revising its rules so that future subsidies take into account not only the costs incurred by the incumbent LEC, but also

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<sup>18</sup> See NCTA Petition at 20.

<sup>19</sup> NPRM ¶ 53.

<sup>20</sup> See Eisenach Analysis at 12-13; see also note 17, *supra* (describing investments by subsidized companies to make their networks broadband capable).

the revenues that the LEC derives from the broadband and narrowband services it provides over its network in the relevant high-cost area.<sup>21</sup>

In addition, as suggested by NCTA, the Commission should reduce or eliminate support in areas where competition exists. Specifically, where a USF recipient is serving an area that is also served by a provider that does not receive USF support, the USF recipient should be required to demonstrate that continued USF support is still necessary despite the presence of an unsubsidized competitor.<sup>22</sup> This approach could be used in conjunction with models or other mechanisms that the FCC may adopt to identify unserved areas and to determine the support needed in those areas.<sup>23</sup>

Finally, in evaluating where support is needed, the Commission should focus on established geographic divisions, such as counties. At a minimum, the relevant geographic markets should be defined in a manner that is technology neutral and does not favor a particular class of service provider.<sup>24</sup>

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<sup>21</sup> See NCTA Petition at 20 (“In considering which costs an [incumbent LEC] should be able to recover through the provision of network services, the Commission should consider revenues from both regulated and unregulated services that are provided in the non-competitive portion of the study area.”).

<sup>22</sup> NCTA Petition at 5, 13.

<sup>23</sup> The *NPRM* also seeks comment on the relationship between USF reforms and carriers’ rates, including intercarrier compensation. *NPRM* ¶ 54. Although USF and intercarrier compensation are inextricably tied together, the reforms suggested in the *NPRM* do not appear to require simultaneous changes to existing intercarrier compensation mechanisms and therefore could be adopted independently of intercarrier compensation reform. Nonetheless, intercarrier compensation reform should remain a high priority for the FCC.

<sup>24</sup> Thus, for example, the Commission should not focus on incumbent LEC service areas in determining which geographic markets should receive support.

## **F. Redirecting the Savings**

Much of the initial savings realized from reductions in traditional high-cost support mechanisms should be used to fund the initial capital expenditures needed to close the broadband gap identified by the NBP. A meaningful share of the savings, however, should be passed through to consumers in the form of lower USF assessments on voice services. In addition, support for the CAF should also decline, as a significant portion of the “investment gap” identified by the Omnibus Broadband Initiative (“OBI”) is attributable to initial capital expenditures, rather than ongoing costs.<sup>25</sup> As the broadband investment gap closes, the Commission should continue to ease the financial burden by reducing the overall size of the Fund. Such action would be consistent with the judicially-recognized principle that the Commission must balance the need to fund universal service against the “principle of affordability for consumers.”<sup>26</sup>

## **III. A MODIFIED VERSION OF THE COMMISSION’S BROADBAND MODEL COULD PROVIDE A VALUABLE FRAMEWORK FOR CALCULATING UNIVERSAL SERVICE SUPPORT**

The Commission requests comment on a number of issues pertaining to the use of a model to quantify the “minimum amount of universal service support necessary to

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<sup>25</sup> FCC, *The Broadband Availability Gap*, OBI Technical Paper No. 1, at 5, Exhibit 1-A (April 2010), available at: <<http://download.broadband.gov/plan/the-broadband-availability-gap-obi-technical-paper-no-1.pdf>> (“OBI Technical Paper”).

<sup>26</sup> *Rural Cellular Ass’n v. FCC*, 588 F.3d 1095, 1102-03 (D.C. Cir. 2009) (in analyzing the sufficiency of universal service funding, the Commission must consider “the need to limit the burden on customers who continue to maintain telephone service”); see also *Alenco Communications v. FCC*, 201 F.3d 608, 620 (5th Cir. 2000) (excessive funding of USF may violate the Communications Act by causing rates unnecessarily to rise and “pricing some consumers out of the market”); *Qwest Communications Int’l v. FCC*, 398 F.3d 1222, 1234 (10th Cir. 2005) (noting that “excessive subsidization arguably may affect the affordability of telecommunications services, thus violating the principle in § 254(b)(1)”).

support networks that provide broadband and voice service.”<sup>27</sup> Specifically, the Commission asks whether the analysis and economic model (the “Broadband Model”) that the Commission staff used to estimate the broadband availability gap provides a useful foundation for calculating support levels needed for the CAF.

Comcast regards the Broadband Model as a valuable analytical tool for estimating the size of subsidies needed to extend broadband to unserved areas. The Broadband Model represents a significant advance in the modeling of communications networks, and has the potential to replace the Hybrid Cost Proxy Model (“HCPM”) and other forward-looking models of the voice network that are used to estimate the costs of providing regulated services as well as the level of subsidy support required. It is clear from the high quality of the Broadband Model that substantial resources and expertise went into its preparation. Nonetheless, it is important that the Commission continue to work on the model prior to adopting its results or using its methodology for sizing or allocating CAF support.

**A. The Broadband Model Should Be Made Available to Outside Parties**

The Commission has provided the public with a very useful and detailed explanation of the model’s major components, including a description of the methodology, assumptions, inputs, engineering specifications, simulations, and a breakdown of results for the default run and several alternative scenarios. This has allowed parties to get an understanding of many of the conceptual and methodological decisions that underlie the results. The narrative description is not sufficient, however, to enable outside parties to test the sensitivity of the model to a wide range of additional

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<sup>27</sup> *NPRM* ¶¶ 13-14.

inputs or alternative modeling assumptions. Public comment, based on outside analysis and running of the model, could improve the quality of the Broadband Model and its usefulness as a tool for sizing and distributing subsidies.

As stated in the introduction to the technical paper describing the model:

An engineering-based model . . . like the one created as part of the National Broadband Plan (NBP) effort, requires a multitude of inputs and can be used to answer many different questions. . . . We form hypotheses about all of these types of inputs to calculate the Broadband Availability Gap; of necessity, some of the hypotheses are more speculative than others. . . . Others may make different assumptions or test different hypotheses or seek to answer somewhat different questions.”<sup>28</sup>

The ability of outside parties to engage in this process of improving the model will be seriously limited if the parties cannot obtain a machine-readable version of the model that will permit them to vary inputs and to test some of the key methodological choices.

**B. Certain Modeling Assumptions Appear to Overstate the Size of the Broadband Availability Gap**

The estimated broadband availability gap presented in the National Broadband Plan is \$23.5 billion. This estimate is based on the Broadband Model and is derived from estimates of the level of additional funding needed to extend broadband to those who do not have access today. The gap represents the difference between the estimated incremental revenues and incremental costs of constructing and operating broadband networks in unserved areas over a twenty year life. There are two major modeling decisions in the base case that deserve mention, because they appear to result in the overstatement of the size of the subsidy that would actually be needed to close the gap.

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<sup>28</sup> OBI Technical Paper at 1.

First, the base case excludes the use of satellite-based broadband, even though as the report recognizes, it “has some clear advantages relative to terrestrial service for the most remote, highest-gap homes: [including] near-ubiquity in service footprint and a cost structure not influenced by low densities.”<sup>29</sup> The cost of serving the “highest-gap” homes using land-based technology, however, is a very large proportion of the total gap amount. (The OBI Technical Paper reports that 57% of the total gap, or \$13.4 billion, is attributable to the cost of serving only 3.5% of the unserved housing units.<sup>30</sup>) If these housing units were served by satellite (even assuming that retail rates for satellite were subsidized to comparable rates for terrestrial service in other areas), the total gap would be reduced to only \$10.1 billion.<sup>31</sup> Although the OBI Technical Paper expresses some concern about whether there will be sufficient satellite capacity to serve these 250,000 households, it would seem that the potential for saving over \$13 billion should drive efforts to examine and address those concerns.

The second major assumption that inflates the size of the estimated gap is the decision to base the cost calculation on the second-lowest cost technology, rather than the lowest-cost technology. For example, if the cost of extending DSL to an unserved area is \$1,000 per household and the cost of using wireless to serve the same area is \$500 per household, the gap is sized using the \$1,000 investment cost of DSL. The reasoning given in the OBI Technical Paper is that if a reverse auction were used to disburse broadband support funds, the lowest-cost bidder would have no reason to bid less than a marginal amount below the cost of the second-lowest cost bidder. Hence, the size of the

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<sup>29</sup> *Id.* at 40.

<sup>30</sup> *Id.* at 40-41.

<sup>31</sup> *Id.* at 41.

subsidy needed to close the gap would be driven by the cost of the second-lowest cost technology. According to the OBI Technical Paper, the size of the gap assuming the lowest-cost operator provides service to all currently unserved areas is \$8 billion,<sup>32</sup> a reduction of over \$15 billion in the subsidies needed to close the gap.<sup>33</sup>

The decision to focus on the second-lowest cost technology warrants reexamination for a number of reasons. First, because in many cases the lowest-cost technology is wireless, it is reasonable to anticipate that more than one wireless company would bid in the auction, which would drive the winning bid down toward the cost of the lowest-cost technology. Second, if the difference between the lowest-cost technology and the second-lowest cost technology were as large as the OBI Technical Paper posits it to be, the Commission would be advised to use some other mechanism than a simple reverse auction to determine the size of the subsidy. These concerns illustrate the importance of designing a subsidy mechanism properly to avoid enriching the subsidized companies at the expense of the public at large.

### **C. Use of a Model to Reform USF Subsidies**

The *NOI* also asks for comment on using a forward-looking economic cost model to determine the subsidy support needed on a total cost basis, rather than an incremental cost basis.<sup>34</sup> Comcast supports additional efforts by the Commission staff to expand the Broadband Model to analyze the total forward-looking economic costs of a modern broadband network. A total cost model has the potential for testing whether all of the

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<sup>32</sup> *Id.* at 39.

<sup>33</sup> The size of this savings is based on the use of terrestrial services only, and does not take into account additional savings that might be realized by using satellite services.

<sup>34</sup> *NPRM* ¶ 33.

explicit subsidies built into current federal and state universal service funds, plus the implicit subsidies built into intercarrier compensation rates, are truly necessary to extend the reach of broadband networks to unserved areas.

For example, the Broadband Model estimates the size of the entire broadband availability gap to be in the range of \$10 billion (for the lowest cost provider) on a 20 year *lifetime* basis. By comparison, federal high-cost support currently exceeds \$4 billion *annually*,<sup>35</sup> which over twenty years would exceed *\$30 billion in present value*. It is hard to imagine why the incumbent LECs require such a large annual subsidy today to support voice service to the already-served part of the market, when a much smaller amount is needed to initiate broadband service to the unserved part of the market – the segment which logically would seem to require the largest subsidies.

A properly constructed total cost model could make the entire subsidy issue more transparent, thereby allowing the Commission to eliminate unnecessary support payments. This, in turn, would help reduce the financial burden on their consumers by limiting subsidies to only the amount needed to advance the Commission's universal service goals.

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<sup>35</sup> See News Release, FCC, "Federal-State Universal Service Joint Board Staff Releases Monitoring Report," at 1 (rel. Dec. 31, 2009), *available at*: <[http://hraunfoss.fcc.gov/edocs\\_public/attachmatch/DOC-295441A1.pdf](http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-295441A1.pdf)> (federal high cost support amounted to \$4.3 billion in 2007 and \$4.5 billion in 2008).

#### **IV. CONCLUSION**

For the reasons discussed above, the Commission should act promptly to first cap, then reduce, the size of the high-cost fund. The Commission should assign part of the savings to support the deployment of broadband into unserved areas and apply the balance of the savings to reduce the overall size and financial burden of the fund. The Commission also should continue to work on the Broadband Model to improve its usefulness in estimating the support required to extend broadband services to unserved areas.

Respectfully submitted,

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July 12, 2010

## **Certificate of Service**

I hereby certify that on this 12th day of July, 2010, I caused true and correct copies of the foregoing Comments of Comcast Corporation to be mailed by electronic mail to:

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