

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

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| In the Matter of |) | |
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| Universal Service Reform |) | WT Docket No. 10-208 |
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| Mobility Fund |) | |
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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 Proposed Rulemaking concerning its creation of a Mobility Fund (“NPRM”).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 *Universal Service Reform, Mobility Fund*, Notice of Proposed Rulemaking, 75 Fed. Reg. 67060 (Nov. 1, 2010) (“NPRM”).

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

The Mobility Fund Should Be Well-Funded, 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 targeted Mobility Fund is an important recommendation made in the National Broadband Plan (“NBP”) as part of the larger discussion of USF reform and broadband deployment, and TechAmerica looks forward to providing further input to the Commission as the Mobility Fund and USF reform develops.

In its NPRM, the Commission seeks comment on a variety of design factors for a Mobility Fund.² With regard to the Mobility Fund’s size, the Commission indicates that it could vary in size from \$100 million to \$300 million. TechAmerica believes that the Mobility Fund should be large enough to accommodate all interested wireless broadband providers³ and to serve as many unserved areas as possible. Thus, the Commission should strongly consider establishing the Mobility Fund at or near the \$300 million level.

Additionally, concerning the technical specifications of the Mobility Fund, TechAmerica applauds the Commission for not requiring that providers employ any particular type of technology in expanding coverage.⁴ TechAmerica does not believe

² NPRM at 67061-67066.

³ TechAmerica suggests that a wireless carrier that receives support from the Mobility Fund should not be precluded from participating in the Connect America Fund.

⁴ NPRM at 67065.

the Commission needs to adopt technology-specific minimum standards. The baseline requirement that providers deploy 3G technologies (e.g., HSPA, EV-DO) that meet 3G data rates is sufficient. Providers should also be allowed to deploy 4G technologies, if technically and economically feasible, without a requirement that the deployment of 4G technologies must meet a higher minimum standard of performance greater than 3G technologies.

The Commission also seeks comment on the access to, and the type of, spectrum required for Mobility Fund eligibility.⁵ TechAmerica believes the Mobility Fund should allow for reasonably competitive opportunities to be made available to as many wireless carriers as possible, including those that use spectrum in the upper bands with its different propagation characteristics. All that should be required is that the frequency band support 3G or better services. Further, with regard to a minimum bandwidth requirement, TechAmerica cautions that any possible requirement be reasonable and not unnecessarily preclude the deployment of efficient 3G technologies.

Broad Coverage Complemented by Targeted Support to Anchor Institutions

Representing all sectors of the broadband industry, TechAmerica believes ubiquitous broadband deployment is a worthy goal. Thus, TechAmerica supports the suggestion that the Mobility Fund should be open to bids for all census tracts identified as “unserved” across the country. Any further limitation on general scope may have the unintended consequence of “picking winners and losers” in the auction process, as certain technologies may operate better (or not at all) in certain areas of the country than in other areas.

⁵ NPRM at 67067.

The Commission emphasizes the need to contain the Mobility Fund's costs and efficiently enhance its impact. TechAmerica wholly supports this goal. Thus, TechAmerica believes that the Mobility Fund should, within census tracts, prioritize targeted 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. Targeting support towards such institutions will provide the most "bang for the buck" and help to contain the size of the Mobility Fund while expediting the deployment of broadband to unserved areas. An additional approach may be to target support within winning bid areas with the highest population and/or areas that include roads ahead of those that do not.

Conclusion

TechAmerica thanks the Commission for embarking on reform of the USF and its creation of the Mobility Fund. If well-funded, broad in scope, and relatively flexible in its technical requirements, the Mobility Fund will provide unserved areas of the country with valuable 3G services that will benefit the country at large economically and socially. TechAmerica looks forward to working with the Commission further on this vitally important policy endeavor.