



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

Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

August 31, 2011

Re: Universal Service and Intercarrier Compensation Reform: WC Docket Nos. 10-90, 07-135, 05-337, 03-109; CC Docket Nos. 01-92, 96-45; GN Docket No. 09-51

Dear Chairman Genachowski and Commissioners Clyburn, Copps and McDowell:

IIA is a broad-based coalition that has actively supported and participated in efforts to expand universal broadband availability and increase mobile connectivity for all Americans, including underserved and rural communities. The IIA includes members such as Alcatel Lucent, AT&T, Corning, Ciena, The Hispanic Technology and Telecommunications Partnership and The National Grange.

IIA applauds the FCC's laser focus on broadband as a critical infrastructure challenge of the 21st Century and supports the FCC's unprecedented efforts to encourage universal broadband deployment by expanding and modernizing the complex federal Universal Service Fund (USF) and Intercarrier Compensation (ICC) rules. By expanding the present scope of these programs from universal availability of voice-only plain old telephone service (POTS) to the universal availability of broadband network services, all Americans will have the opportunity to reap the enormous economic, health, education and other benefits that broadband can deliver.

IIA is pleased and delighted to see that key industry and association stakeholders have come together to forge and support an unprecedented consensus framework they call "America's Broadband Connectivity Plan" (ABC Plan), which confirms universal access to broadband as a national priority and strongly tracks the FCC's roadmap with respect to fundamental reforms in the USF and ICC rules on the books today. In particular, IIA embraces the ABC Plan's proposal to modernize USF and ICC rules to include broadband by creating a Connect America Fund (CAF) and an Advanced Mobility/Satellite Fund. IIA also commends the ABC Plan for its proposals to control the size of the fund and broaden its contribution base, require accountability from companies receiving support, and transition to market-driven and incentive-based policies.

Benefits to Consumers

IIA supports the ABC Plan's goal to ensure that approximately four million rural homes and businesses in high-cost areas served by price cap ILECs will have access to broadband – two million of which will enjoy the benefits of broadband for the first time. The ABC Plan will encourage private investment and more effectively control the size of high-cost support, thereby limiting the burden these programs place on consumers.

Broadband providers receiving funds from the CAF will provide consumers broadband service (either wireline or wireless) with a minimum bandwidth of 4 Megabits per second downstream, and 768 kilobits per second upstream. The higher assured speeds will enable consumers to access a wide variety of critical services, including broadband, education and health care applications.

Conclusion

No household or business in America should be without access to affordable broadband services. It is generally recognized that current USF and ICC regulations, designed to support legacy voice services, are dated and in need of reform. We applaud the constructive work of the Commission and the organizations that participated in the formulation of the ABC Plan. Your work and theirs will make a lasting contribution by fostering investment in state-of-the-art broadband networks, especially in underserved and rural areas. We encourage the FCC to proceed with adopting and implementing the ABC Plan as soon as possible.

Sincerely,



Rick Boucher
Former Congressman (D-VA) and Honorary Chairman, Internet Innovation Alliance



Bruce Mehlman
Co-Chairman, Internet Innovation Alliance



Jamal Simmons