

To Chairman Julius Genachowski, Commissioners Michael Copps, Mignon Clyburn and Robert McDowell,

The National Broadband Plan despite its failings included one good proposal to revamp and reform the Universal Service Fund for the 21st Century by funding broadband. At a recent Senate Committee hearing on Expanding Broadband Access former FCC Chairman Michael Powell who now works for the National Cable & Telecommunications Association pointed out for most of the 20th Century the federal government allowed monopolies in our telecommunications marketplace that promised huge efficiencies but produced little benefit for consumers. Fortunately as he noted AT&T's Ma Bell System was broken up in 1984. The failure of the National Broadband Plan was in its inability to address the lack of competition in wire-line and wireless services that now exists and to promote steps to boost broadband adoption.

Former Chairman Powell also noted that USF Reform that modernizes this system created for an analog telecommunications age to subsidize telephone service by turning it into a fund for broadband services should be technology neutral -- subsidize broadband deployment in rural areas unserved already whether it be via fiber optic cable, wireless, DSL, satellite etc. It should NOT subsidize the duopoly wire-line broadband providers financial bottom line but benefit consumers. Corporations will lobby for and make their own proposals involving USF Reform with regard to broadband that will benefit them. However, the FCC has a mandate to protect and promote the public interest. What's good for the big service providers might not be good for the consumers.

So what we need is more competition providing consumers more choice, better service and affordable fair prices. USF funding should go to the areas that need it most with regard to funding broadband deployment and be used to fund whatever technology works best for each community in broadband deployment. In regard to compensation the compensation would have to be more fair for consumers. Considering that providers who participate in Universal Service Fund add USF fees to consumers bills and consumers faced with increasing bills are having more of their money paid to carriers being directed into the Universal Service Fund -- the problem being the amount consumers have to pay it would be fair for the consumer to require participating USF providers to pay slightly more on their own into the Universal Service Fund so the amount consumers pay carriers that goes into USF can be reduced somewhat.

With regard to competition the FCC must mandate competition among the wire-line and wireless providers. Breakup Qwest/CenturyLink, Qwest/US West, AT&T SBC Communications/Bell South, Windstream, etc and give consumers more choice in broadband services. The FCC's proposed USF reforms should not favor one form of broadband technology over another getting back to what was said about it being technology neutral.

The USF reforms should not hinder competition, nor allow increased payments to duopoly wire-line providers and monopoly carriers to increase broadband deployment while providing little benefits for consumers. USF Reform should be fair above all for the consumer. Corporate special interest groups and lobbyists will have their say of what they want from USF. I also think USF should encourage open, interoperable universal access. Transparency on the part of the carriers should be required and carriers accepting public money or spectrum should abide with certain public interest obligations like Network Neutrality rules of nondiscrimination. Now all ISPs should be required to comply with this but providers accepting taxpayer subsidized funding or public spectrum most importantly should not be able to use public resources to build or an expand a network through which the provider intends to discriminate against users and innovators online. Mobile broadband is in itself becoming very important as more consumers are getting wireless devices and 1/3 of broadband households are using wireless only devices like smartphones and tablet computers like the Apple iPhone, Apple iPad etc so mobile should get a fair amount of compensation.

Also USF should not overpay or underpay at all. Unsustainable automatic increases in USF funding are not good. There should be caps to prevent funding to keep growing and growing if increased funding threatens to cause an insolvency in the program.