

**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
	)	
Establishing Just and Reasonable Rates for Local Exchange Carriers	)	WC Docket No. 07-135
	)	
High-Cost Universal Service Support	)	WC Docket No. 05-337
	)	
Developing an Unified Intercarrier Compensation Regime	)	CC Docket No. 01-92
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Lifeline and Link-Up	)	WC Docket No. 03-109
	)	
Universal Service Reform – Mobility Fund	)	WT Docket No. 10-208

**COMMENTS OF THE INFORMATION TECHNOLOGY INDUSTRY COUNCIL**

**January 18, 2012**

**INTRODUCTION AND SUMMARY**

The Information Technology Industry Council (ITI) represents fifty of the nation’s leading information technology companies, including computer hardware and software, Internet services, and wireline and wireless networking companies. ITI is the voice of the high tech community, advocating policies that advance U.S. leadership in technology and innovation, open access to new and emerging markets, support e-commerce expansion, and enhance global competition.

ITI welcomes the opportunity to provide comments on this matter that is of great importance to the information technology sector. ITI's members are at the forefront of developing and manufacturing the technologies and Internet services that are bringing cutting edge broadband innovations to the American public.

As the National Broadband Plan states, broadband is essential for economic growth, job creation, and global competitiveness. Unfortunately, there are approximately 100 million Americans that do not have broadband access at home. As Internet Protocol-based broadband networks displace circuit-switched voice networks, it is critical that the Universal Service system transition to support deployment of this essential service. Access to broadband service will be increasingly necessary for all Americans to compete globally and to fully take advantage of new educational opportunities, basic government services, health care services, and employment opportunities. ITI strongly supports the Commission progress on transitioning the Fund to support broadband deployment, and offers the following comments on Sections XVII A-K of the Further Notice of Proposed Rulemaking.

## **BROADBAND PUBLIC INTEREST OBLIGATIONS**

### **I. The Commission Should Develop Separate Performance Benchmarks for Mobile Broadband Networks Independent of Fixed or Wireline Networks.**

The Commission asks if mobile broadband services should have different performance benchmarks than other types of broadband services.<sup>1</sup> ITI believes mobile broadband services should have different benchmarks than fixed or wireline broadband services. While mobile broadband service is capable of providing data rates and latencies

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<sup>1</sup> In the Matter of Connect America Fund, *Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 10-90, FCC 11-161 (rel. Nov. 18, 2011) (“Notice”) at ¶ 1021, 1022, 1023.

that support advanced applications, wireless networks are susceptible to many additional variables that could affect their performance. The requirements should take into consideration the technical, operational, commercial, capacity and other differences between wireless and other broadband Internet access platforms.

## **MOBILITY FUND**

### **II. The Commission Should Use Reverse Auctions to Determine Recipients.**

ITI has supported reverse auctions to distribute funds in previous filings, and commends the Commission for moving forward with this efficient, market-driven approach to distributing funds under Phase II of the Mobility Fund.

### **III. Mobility Fund Phase II Performance Metrics Should Be More Advanced.**

The Commission proposes Mobility Fund Phase I and Phase II recipients be required to meet certain bandwidth data rates, both under difficult conditions as well as at the network edge.<sup>2</sup>

As ITI has previously commented, we believe funding should be contingent on meeting specified data rate requirements. To that end, we believe funding in both Phase I and Phase II of the Mobility Fund should be based solely on data rate metrics and not classes of technologies. Many advanced 3G technologies can deliver performance surpassing what is required of 4G technologies in this Order and FNPRM.

ITI supports setting two metrics in Phase II of the Mobility Fund. Half of the funding dedicated to Phase II support should go to networks that provide at least 1 megabit per second (Mbps) in at least one direction today, transitioning to at least 2.5

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<sup>2</sup> Notice at ¶ 1142.

Mbps in at least one direction after two years. The other half of the funding during Phase II should be used for wireless networks that meet an *initial* target of 4 Mbps downstream, and 1Mbps upstream.

As mentioned above, wireless network performance can be affected by a number of factors, but the speeds suggested in the preceding paragraphs more accurately reflect today's technology as well as the needs of the average consumer.

#### **IV. Evolution of Phase II Requirements Should be Based on Current Usage Trends.**

ITI believes that to ensure funds are used to deploy networks that will run not just today's broadband services and applications, but tomorrow's as well, Phase II should be more forward-looking in performance requirements initially, and review performance requirements on an annual basis.

As the Commission has previously recognized, advanced applications such as two-way video conferencing requires speeds of at least 5Mbps. Some high-end video may require a connection that can deliver 10 Mbps. Performance requirements should evolve to support buildout of networks capable of reliably delivering commonly used services and applications.

#### **CONCLUSION**

Again, ITI commends the Commission for moving forward on modernizing the Universal Service Fund to support broadband deployment and service. Taking into consideration the comments above, ITI urges the Commission to be forward looking as it develops criteria for supporting broadband deployment.

Respectfully Submitted,

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