



August 27, 2013

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: Determining the Fraction of Supported Locations that will Receive Speeds of 6/Mbps/1.5 Mbps or Greater; WC Docket No. 10-90

Dear Ms. Dortch:

The Price Cap Carrier Coalition advocates that, in determining the number of supported locations to which eligible telecommunications carriers must offer at least 6 Mbps/1.5 Mbps service under the state-level commitment, the Bureau use a 12-kilofoot design in the Connect America Cost Model. Such an approach is most closely aligned with the types of networks carriers will actually deploy to fulfill the requirements of Connect America Fund (CAF) Phase II, and likely will result in a majority of supported locations capable of attaining download speeds in excess of 4 Mbps.

We estimate that more than 50 percent of supported locations should be able to attain service at speeds of 6/1 Mbps or better, and there will be a significant number of locations that can achieve speeds of 12/1 Mbps or better. More precise figures are unavailable because 4/1 Mbps is not a standard to which carriers have deployed previously, and carriers will be using different technologies, resulting in different speed distributions, to fulfill CAF Phase II deployment obligations. Pair bonding generally provides higher download speeds closer to the DSLAM while maintaining 1 Mbps upload speeds. Annex-M, in contrast, attains 1 Mbps upload speed on a loop by trading against download bandwidth. Despite their differences, these technologies both will result in a large percentage of supported locations capable of receiving download speeds in excess of 4 Mbps.

While the difference between the user experience offered by 6/1 Mbps and 6/1.5 Mbps services is minimal, the percentage of locations that would receive 6/1.5 service with pair bonding or annex-M is much smaller, and the Bureau's analysis based on a 12-kilofoot design should be viewed as providing the best estimates for these figures. If the Bureau chooses to use a 5-kilofoot design to estimate the number of supported locations that should receive 6/1.5 Mbps service, it will require carriers to expend significant extra cost without sufficient corresponding gains. Importantly, this extra cost will need to be aligned with a significant reduction in the number of supported locations associated with the state-level commitment, or carriers in many cases will find it infeasible to accept a state-level commitment and complete the corresponding deployment of robust broadband service.

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Therefore, the Bureau, by using a 12-kilofoot design, will be fulfilling the Commission's request "to ensure that the most locations possible receive a 6 Mbps/1.5 Mbps or faster service at the end of the five year term."<sup>1</sup>

Sincerely,

A handwritten signature in black ink, appearing to read "Robert L. Mayer". The signature is fluid and cursive, with the first name "Robert" being the most prominent.

Robert Mayer  
Vice President  
Industry and State Affairs

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<sup>1</sup> See *Connect America Fund, et al.*, WC Docket No. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663, at ¶ 187 (2011).