

#3. The FCC's definition of broadband should grow exponentially, as described by Nielsen's Law. One variant says a high-end user's connection speed grows by 50% per year.

Is the point of defining broadband to allow places that don't have it to be classified as "underserved"? Public funding should not be available for telecom projects that are not capable of continuing to offer "broadband" for, say, 20 years, as the definition of broadband continues to increase exponentially over that time.

4 Mbps down and 1 Mbps up is inadequate. 10 Mbps down and 3 Mbps up would be better. Symmetrical upload and download speeds would be better than asymmetrical.

#5. If the FCC chooses a new benchmark "every few years," perhaps each choice should be a function that shows how speed increases exponentially over those "few years." One way to do this would be to enumerate a sequence of speeds, one for each of the "few" years. For example: 10/10 Mbps, 15/15 Mbps, 22.5/22.5 Mbps.

#13. Yes, broadband should be capable of delivering its defined speeds even during peak times.

#15. The FCC should intend to adjust the broadband benchmark speed annually, either by deciding annually, or by deciding every "few years" on an exponential sequence of automatic annual adjustments. (See #5.)

#16. In 2014, a 1-Mbps upload speed is inadequate.

#17. Defining broadband to have symmetrical speeds would be ideal.

#18. Setting broadband's speed benchmark based on adoption rates is problematic, because adoption rate can be heavily influenced by pricing policies. Longmont, CO, is building out a municipal fiber-to-the-premises (FTTP) network and offering 1-Gbps symmetrical residential Internet service for \$49.95 per month. Let's see what the adoption rate turns out to be. Sonic will be offering 1-Gbps symmetrical residential Internet service, bundled with phone service, for \$40.00 per month in parts of Brentwood, CA. Let's see what the adoption rate turns out to be.

#20. I don't think it's reasonable to limit the definition of broadband to something that has already achieved a subscription rate of 70%. That isn't "advanced."

#22. It would be all right with me if FCC based its broadband speed definition on the needs of teleworkers, who need more speed -- especially more upload speed -- than typical families.

#23. Yes, FCC should acknowledge the need for exponential increases in broadband's speed over the years.

#24. If wireless can't deliver broadband, according to the FCC's definition, then so be it. Wireless is not an acceptable substitute for wired.

#25. Latency is important, but I don't know how to define a one-size-fits-all end-to-end latency requirement for broadband's latency.

#43. At some point, further investment in copper-based wired infrastructures will not make sense, and the issue will be, what kinds of FTTP technology investments make sense. Arguably, we have already reached that point.

\$49. Preempt state barriers to municipal broadband deployment.