

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Inquiry Concerning the Deployment of)	GN Docket No. 14-126
Advanced Telecommunications Capability to)	
All Americans in a Reasonable and Timely)	
Fashion, and Possible Steps to Accelerate)	
Such Deployment Pursuant to Section 706)	
of the Telecommunications Act of 1996, as)	
Amended by the Broadband Data)	
Improvement Act)	

**REPLY COMMENTS OF THE
NATIONAL ASSOCIATION OF TELECOMMUNICATIONS
OFFICERS AND ADVISORS**

The National Association of Telecommunications Officers and Advisors (“NATOA”) submits these comments in response to the above-captioned Tenth Broadband Progress Notice of Inquiry (“NOI”),¹ released August 5, 2014. NATOA’s membership includes (1) local government officials and staff members from across the nation whose responsibility is to develop and administer communications policy and the provision of communications services for their communities; (2) communities that operate broadband wireline and wireless infrastructure for anchor institutions – serving the needs of government, schools, libraries, first responders, and emergency support personnel; and (3) communities that have constructed, or are in the course of

¹ *In re Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, and Possible Steps to Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act of 1996, as Amended by the Broadband Data Improvement Act*, Tenth Broadband Progress Notice of Inquiry, GN Docket No. 14-126, FCC 14-113 (August 5, 2014).

constructing broadband infrastructure to meet public needs, or are offering broadband services to the public within their jurisdictions. These members manage networks in urban, suburban and rural areas across America.

NATOA and its members are representatives of the American people in the most fundamental and immediate sense. We are local governments and agencies, working directly with our respective communities to ensure that they have the most advanced communications services they need to compete in a global economy and better serve the needs of their residents. At the local level, we are in the unique position to understand what true, affordable broadband access might mean for our citizens and our communities. We urge the Commission to adopt a new, increased, and flexible benchmark for “advanced telecommunications capability” that will enable our residents to receive and transmit high-quality voice, data, graphics, and video communications.

I. The Adoption of a New Minimum Broadband Speed Threshold is Imperative

America’s local governments recognize broadband as critical infrastructure – a utility that is essential to economic and community development. Every year, the demand grows for faster speeds and more capacity. It is imperative that our definition of broadband keeps pace with the extraordinary growth of Internet usage and must account for – and enable – future growth and innovation. The failure to do so will hinder our ability as a nation to compete with nations abroad that have outpaced us in their deployment of high capacity broadband.

As we have stated previously, we continue to believe that the current standard of actual download speeds of at least 4 Mbps and upload speeds of at least 1 Mbps is simply too low in light of today’s technological advances and consumer needs. It also fails to recognize the speeds that broadband providers currently make available to consumers.

It is important to protect the trust of American consumers and to establish a definition for broadband that will support the applications available in the marketplace today, as well as rapidly emerging technologies and applications for teleworking, distance learning, and telemedicine. With this in mind, we believe, in the near term, that the minimum threshold speed should be revised upward and set at a sustained 10 Mbps, symmetric level at peak usage times, for residential and small business users, and at 1Gbps for enterprise users. We feel this standard is in line, for the most part, with currently available services and will enable the increased adoption of applications that require more than the current 4/1 Mbps speed threshold.

II. The Minimum Broadband Speed Threshold Must Not be Static

These proposed end user-measured speeds represent workable short-term benchmarks based on today's applications and needs. But needs are continually changing and applications are emerging that demand far greater capacity. As a result, our national definition of broadband must keep pace with the extraordinary growth and innovation for current and future Internet use. This is why we again urge the Commission to avoid establishing a static point at which to gauge the progress and growth in the broadband market from one report to another. An increase to the current 4/1 Mbps threshold and periodic updates would help reach long-term national broadband goals and establishing a minimum sustained actual speed of 10 Mbps symmetric as the definition of broadband would ensure that broadband in the United States stays on par with international standards and keeps pace with consumer demands and technological developments. Furthermore, a higher minimum threshold will ensure that federal and state funded broadband deployment projects will provide businesses and consumers with the speeds and capacity needed to support the applications they need and want.

In its comments, the City of Boston, which has long advocated for increased broadband deployment and investment, especially in under-served and lower-income neighborhoods, and whose major industries include innovative technology, also advocates increasing the minimum broadband downstream speed requirement to at least 10 Mbps.² “The 4/1 Mbps benchmark does not enable users to utilize the services and applications that they seek today.”³

III. The Commission Should Adopt a Higher Speed Threshold for Fixed Broadband Services to Elementary and Secondary Schools

We continue to assert that establishing a higher speed threshold for fixed broadband services to elementary and secondary schools will further the goal of the National Broadband Plan of connecting an anchor institution in every community to affordable 1 Gbps broadband. Studies have shown that most schools require a connection of 50 to 100 Mbps per 1,000 students.

VI. Conclusion

Access to affordable, reliable broadband service is essential for all Americans. As such, a new minimum broadband speed threshold is needed that more accurately reflects the higher speeds now currently available in the marketplace, and that meets the increasing demands of the consuming public.

Respectfully submitted,



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September 19, 2014

² See, Comments of the City of Boston, Massachusetts (filed Sep. 4, 2014).

³ *Id.* at 6.