



December 1, 2023

Via ECFS

Federal Communications Commission
Washington, DC 20554

Re: GN Docket No. 22-270, Inquiry Concerning Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion

The Computer & Communications Industry Association (CCIA) is pleased to respond to the Section 706 Notice of Inquiry (NOI) seeking input for the “next annual assessment concerning the ‘availability of advanced telecommunications capability to all Americans.’”¹

High-speed telecommunications services are the lifeblood of the internet ecosystem and an essential tool for participating in the modern economy. The FCC’s stalwart determination to foster, spur, and incentivize the buildout of advanced networks has been and remains a necessary tool for expanding the reach of broadband. That tool plainly has reaped rewards: fiber-based transmission facilities now reach 55.6% of U.S. households and fiber-based broadband has gained approximately 5.6 million new residential customers since December 2021.²

CCIA supports the Commission’s proposal to amend the definition of “advanced telecommunications capability” to add a new a speed benchmark of 100 Mbps download and 20 Mbps upload.³ The exponential growth in teleworking and teleschooling caused by the pandemic makes this increase in benchmark speeds necessary. It has been 8 years since 25 Mbps/3 Mbps was adopted as the broadband benchmark; the subsequently expanded reliance upon and innovation within the American digital economy has made those numbers woefully inadequate. This amended 100/20 Mbps benchmark should apply, as the Commission suggests, to all fixed broadband service.⁴

With regard to the further, “long-term goal” of defining “advanced telecommunications” at a benchmark of 1 Gbps down/500 Mbps up,⁵ CCIA supports any Commission effort to encourage and foster the continued evolution of the United States telecommunications network. Defining “long term” to mean ten years likewise seems appropriate.⁶ Certainly any funding directed toward networks planned for the 2030s should strive to be more and do more than what the network supports today. As the NOI notes, the 1 Gbps/500 Mbps standard already is applied as a benchmark for some rural-focused Universal Service Fund (USF) programs.⁷ The

¹ GN Docket No. 22-270, *Seventeenth Section 706 Report Notice of Inquiry*, FCC 23-89 ¶ 1 (rel. Nov. 1, 2023).

² Shelby Brown, “More Than Half of the U.S. Has Access to Fiber High-Speed Internet Service” (Nov. 15 2023), <https://cordcuttersnews.com/more-than-half-of-the-u-s-has-access-to-fiber-high-speed-internet-service/>.

³ NOI ¶ 8.

⁴ *Id.* ¶ 20.

⁵ *Id.* ¶ 26.

⁶ *Id.*

⁷ *Id.*



Commission, in adopting this speed and any other broadband-threshold speed, should be explicit in stating that these metrics are technology-neutral; all broadband services should be defined by a singular speed threshold.

The NOI also asks how the Commission should address and satisfy the “affordability” tenet of Section 706.⁸ CCIA remains mindful of the budgetary strain that USF is facing. To the extent that the Commission plans to move toward the 1 Gbps/500 Mbps threshold for advanced telecommunications services, affordability becomes a material consideration from both a deployment and a subscription perspective. CCIA suggests that close attention be paid to how increasing the threshold to 1 Gbps/500 Mbps might put additional pressure on the Fund.

CCIA appreciates the opportunity to participate in this proceeding and is available to provide any additional perspective that might be helpful to the Commission.

Sincerely,

Stephanie Joyce
Chief of Staff and Senior Vice President
CCIA

⁸ NOI ¶¶ 7, 54-57.