



PUBLIC NOTICE

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COMMENT SOUGHT ON RELATIONSHIP BETWEEN BROADBAND AND ECONOMIC OPPORTUNITY

NBP Public Notice #18

PLEADING CYCLE ESTABLISHED

GN Docket Nos. 09-47, 09-51, 09-137

Comment Date: December 4, 2009

In the American Recovery and Reinvestment Act of 2009 (Recovery Act), Congress directed the Commission, in its development of a National Broadband Plan, to include “a plan for the use of broadband infrastructure and services in advancing... community development... worker training, private sector investment, entrepreneurial activity, job creation and economic growth.”¹ In furthering the FCC’s understanding of these critical issues in advance of the Plan’s February release, the Commission seeks public comment on a series of questions related to small businesses (defined for purposes of this Public Notice as businesses with 500 or fewer employees), medium and large businesses (defined for purposes of this Public Notice as businesses with more than 500 employees), non-profit organizations, economic opportunity and workforce development.²

- I. **Community Hubs:** In areas of suboptimal deployment and adoption, local community hubs (defined as places such as libraries, community colleges, job training centers, unemployment offices, etc.) and organizations often present themselves as stop-gaps for individuals to obtain access to broadband. We are looking for information about how these hubs are used in ways that create economic opportunities.
 - a. What are the key community hubs that often act as access points for individuals to gain broadband access?
 - b. What is the current broadband availability rate at libraries? Community colleges? Job training centers? Unemployment offices? Computing centers and tribal “chapter houses” on tribal lands? We welcome detailed data on adoption and speed at community hub points, especially as it relates to the following questions:

¹ American Recovery and Reinvestment Act of 2009, Pub. L. No. 111-5, § 6001(k)(2)(D), 123 Stat. 115 (2009) (Recovery Act).

² Those with the vantage point of small, medium, or large businesses, non-profit organizations, or SDBs (*see* II.d.iii., *infra*), are welcome to comment on any of the avenues of inquiry in this Public Notice.

- i. What kinds of connections do these hubs offer (dial-up, DSL, cable, DIA)? If shared amongst multiple computers, what is the individual computer access speed?
- ii. What is the ratio of available connections to number of people regularly served by the community hub? Are there often waiting lines for connectivity? What are the limits on access for individuals, such as time limits on individuals, restriction of activities, etc?
- c. What off-line services do these hubs offer that help make broadband more relevant or useful, such as training, digital literacy, resource guides, etc? What classes and services can hubs deliver? What level of training and job readiness do they offer?

II. Business Adoption and Usage: In cultivating the economic benefits of broadband, adequate availability, adoption and usage of broadband by business is a central component. We seek to better understand what level of connectivity is required for businesses of varying sizes and in different business verticals, and how those capabilities are best utilized by businesses.

- a. To what extent is broadband available to businesses across the country today?
 - i. Where are the broadband access services (ADSL, SDSL, cable modem, FTTx, satellite, fixed wireless, DIA) currently available to businesses?
 - ii. Do mobile broadband services for businesses constitute a reasonable alternative (rather than a complementary solution) to wireline access? If so, under what circumstances? If no, why not?
 - iii. Where are the key areas where businesses are unserved / underserved? We welcome detailed data on how this correlates to geographic and/or demographic factors, such as population density or income.
- b. Given the different applications and levels of service reliability that many businesses may require from their Internet connections as compared to residential consumers, how do the necessary broadband requirements differ in a particular business environment? How should businesses and broadband service providers define “business-grade broadband”?
 - i. What types of businesses require Dedicated Internet Access (DIA) service, and at what capacity / service level?
 - ii. If a business does not purchase a dedicated line service, does purchasing excess capacity for shared fiber-based connections alleviate issues around network performance? Does over-provisioning bandwidth eliminate concerns around latency or reliability?
 - iii. How do requirements differ depending on business size?
 - iv. How do requirements differ depending on business vertical / industry?
 - v. What types of disclosures (around speed, service reliability, price, alternative options, supported applications, etc.) should broadband service providers make to allow businesses to make well-informed broadband purchasing decisions?
- c. What key applications are most critical to business productivity? What is the role that broadband plays in enabling these applications?
 - i. How do Advanced IT applications such as Customer Relationship Management (CRM), Enterprise Resource Planning (ERP), Supply Chain Management (SCM), Storage Area Networking (SAN), web conferencing, video conferencing, remote terminal and management, business intelligence and knowledge management contribute to business productivity? What other applications are critical to business productivity?
 - ii. How can we quantify the productivity benefits of using these applications for businesses? What are the most appropriate metrics to correlate productivity to key applications (man hours saved, overall change in output, capital savings, etc.)?

- iii. What level of broadband speed is necessary for businesses to effectively use these applications?
- iv. What level of network performance / reliability (defined by parameters such as availability, packet loss, jitter, and latency) is necessary for business to effectively use these applications?
- v. What are the other barriers to application adoption and usage beyond speed and network performance? How significant of an impact can Advanced IT training programs have on application adoption and usage?
- vi. What applications are necessary to enable telework and/or telecommuting (both fixed and mobile)? How does telework and/or telecommuting by employees impact business productivity?
- vii. How are applications employed differently by companies according to their business function? What applications support product development, production, sales, billing, or customer support? Do broadband connectivity needs vary depending on the kind of business operation?
- d. What are the particular broadband needs of small businesses, as defined above?
 - i. Do these businesses require a different level of connectivity or application usage than medium or large enterprises?
 - ii. Are there sufficient services and applications tailored to small businesses?
 - iii. What are the unique needs of Small Disadvantaged Businesses (SDBs), defined as a small business that is at least 51 percent owned and controlled by a socially and economically disadvantaged individual or individuals. Such entities include: African Americans, Asian Pacific Americans, Hispanic Americans, Native Americans and Subcontinent Asian Americans?³
 - iv. What are the unique needs of business that are primarily owned and controlled by women?
- e. What are the economic effects of business broadband?
 - i. What are the benefits to entrepreneurs? What best practices / examples for fostering entrepreneurial development currently exist that could benefit from broadband-enabled services?
 - ii. What are the effects of training programs that improve the Advanced IT skills of IT managers or other employees within a business? How are these effects quantified?
 - iii. Are existing Advanced IT / application training programs offered by state organizations or private training organizations sufficient to handle the needs of businesses? Are these programs sufficiently funded today?

III. **Broadband's Role in Regional Economic Development:** We are interested in the ways in which broadband might help localities and regions attract new businesses and build up economic bases. We seek to better understand ways in which broadband does and does not facilitate that development and what institutions are critical in supporting that development.

- a. In areas where broadband deployment is new, what new business and jobs have come that were not previously possible?
 - i. Did these businesses move from somewhere else, or did they not exist at all previously?
- b. What is the minimum connection availability that attracts new businesses and jobs?
 - i. How important is redundancy? To what degree does local competition for broadband access act as a prerequisite for local development?

³ Cf. 13 C.F.R. Part 24 (SBA regulations concerning SDB determinations).

- ii. What other broadband access service characteristics are important in attracting new businesses and jobs? How do the key characteristics vary depending on size or type of businesses that a region is looking to attract?
- c. What are successful local, regional, or state-based supports (such as fellowship programs, innovation hubs, etc.) to develop businesses that depend on or innovate using broadband?
 - i. How have communities partnered with industry to foster more entrepreneurs? What public-private models have been most successful at seeding new entrepreneurs?
 - ii. How effective are linkages between existing businesses and entrepreneurs to foster more innovation?
- d. What have been effective methods of enabling broadband usage amongst small and medium-sized enterprises in localities or regions?
 - i. To what extent have such efforts enabled enterprise and job growth?
 - ii. How have such efforts contributed to innovative products and solutions?
- e. What are the positive implications on workforce development and economic opportunity for tribal lands from expanded access to broadband capability?
 - i. What are the positive implications for tribal lands from expanded use of teleworking?

IV. **Government-Provided Social Benefit Programs:** Informal research has suggested the provisioning of critical government services designed to help foster economic opportunity is an area where broadband could be instrumental in creating substantial value and efficiency. Under current benefit program constructions, not all those that are eligible actually receive benefits. We seek to understand the scope of the problem as well as the ways in which broadband may be able to alleviate it.

- a. How many people receive critical government provided social benefits today? What percentage of those who are eligible/entitled to benefits do not receive benefits?
 - i. To what degree are eligibility and application procedures hindrances in individuals receiving benefits? We would welcome data on the obstacles currently within benefits administration.
- b. What percentage of individuals who currently receive federal benefits have access to broadband now? We welcome detailed analysis on the number of federal benefits recipients, their access to broadband, and data suggesting whether the accessibility of federal benefits online would act as a driver for adoption.
- c. What is the current administrative cost of key federal benefits programs [Supplemental Nutrition Assistance Program (SNAP), Supplemental Security Income (SSI), Temporary Assistance for Needy Families (TANF)]? To what degree can this cost be lessened by shifting more benefits administration online?
 - i. What are current error rates within system as presently constituted?
- d. What are currently successful models of electronically administered benefits? What municipalities or states are particularly effective at electronic applications and disbursements of benefits? We welcome detailed data on results for these applications.

V. **Workforce Development:** Federally-supported job training and placement programs help Americans get jobs, find higher paying opportunities, and allow many Americans to retain their current jobs. In examining how increased broadband access could impact our country's federally-supported workforce development program, we seek comments on the following areas:

- a. What are some ways to quantify demand for federally-supported job training and job placement services?
- b. What are the various ways that Americans learn about the availability of federally-supported job training and job placement opportunities?

- c. Can job training be effectively delivered via an online environment? If not, why? If so, what types of skills and jobs can be effectively taught through an online platform? Please provide data to demonstrate the effectiveness of job training delivered online.
- d. How many people have participated in online job training?
- e. What are some examples of successful online job training pilots? Please provide data and detailed information.
- f. What new online applications, functionality, or services relating to job training and job placement could be created that would address some of the challenges faced by people who are unemployed?
- g. What role and in what form should the federal government play in providing job training and job placement assistance to the American public?

This matter shall be treated as a “permit-but-disclose” proceeding in accordance with the Commission’s *ex parte* rules. See 47 C.F.R. §§ 1.1200, 1.1206. Persons making oral *ex parte* presentations are reminded that memoranda summarizing the presentations must contain summaries of the substance of the presentations and not merely a listing of the subjects discussed. More than a one- or two-sentence description of the views and arguments presented generally is required. See 47 C.F.R. § 1.1206(b). Other rules pertaining to oral and written *ex parte* presentations in permit-but-disclose proceedings are set forth in section 1.1206(b) of the Commission’s rules, 47 C.F.R. § 1.1206(b).

All comments should refer to GN Docket Nos. 09-47, 09-51, and 09-137. Please title comments responsive to this Notice as “Comments—NBP Public Notice # 18.” Further, we strongly encourage parties to develop responses to this Notice that adhere to the organization and structure of the questions in this Notice.

Comments may be filed using (1) the Commission’s Electronic Comment Filing System (ECFS), (2) the Federal Government’s eRulemaking Portal, or (3) by filing paper copies.⁴ Comments can be filed through the Commission’s ECFS filing interface located at the following Internet address: <http://www.fcc.gov/cgb/ecfs/>. Comments can also be filed via the Federal eRulemaking Portal: <http://www.regulations.gov>.⁵ Generally, only one copy of an electronic submission must be filed. In completing the transmittal screen, commenters should include their full name, U.S. Postal Service mailing address, and the applicable docket or rulemaking number. Parties who choose to file by paper must file an original and four copies of each filing.

Filings can be sent by hand or messenger delivery, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail (although we continue to experience delays in receiving U.S. Postal Service mail). All filings must be addressed to the Commission’s Secretary, Office of the Secretary, Federal Communications Commission.

- The Commission’s contractor will receive hand-delivered or messenger-delivered paper filings for the Commission’s Secretary at 236 Massachusetts Avenue, N.E., Suite 110, Washington, D.C. 20002. The filing hours at this location are 8:00 a.m. to 7:00 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes must be disposed of before entering the building.

⁴ See Electronic Filing of Documents in Rulemaking Proceedings, 63 Fed. Reg. 24121 (1998).

⁵ Filers should follow the instructions provided on the Federal eRulemaking Portal website for submitting comments.

- Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9300 East Hampton Drive, Capitol Heights, MD 20743.
- U.S. Postal Service first-class mail, Express Mail, and Priority Mail should be addressed to 445 12th Street, S.W., Washington, D.C. 20554.

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For further information about this Public Notice, please contact Randy Clarke at (202) 418-1500.

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