

**STATEMENT OF
COMMISSIONER JONATHAN S. ADELSTEIN,
APPROVING IN PART, CONCURRING IN PART**

Re: Development of Nationwide Broadband Data to Evaluate Reasonable and Timely Deployment of Advanced Services to All Americans, Improvement of Wireless Broadband Subscriberhip Data, and Development of Data on Interconnected Voice over Internet Protocol (VoIP) Subscriberhip, Report and Order and Further Notice of Proposed Rulemaking (Mar. 19, 2008).

I have long stated that we need to collect more accurate and reliable data concerning the status of broadband deployment, availability, affordability, and competition, if we are to develop effective policies that promote access to broadband services, which is our charge under the Telecommunications Act of 1996. It is the first step toward a real national broadband strategy. So, while I believe there are still gaps to fill, I am pleased that this Order makes a number of important improvements in our data gathering efforts which should assist policymakers at all levels of government. With the benefit of this additional data, the contours of the broadband challenge should become clearer, if still short of high definition.

As I have repeatedly noted, current Commission practices fall far short. Two years ago, the Government Accountability Office (GAO) criticized the Commission's ability to analyze who is getting broadband and where it is deployed, observing that the FCC's data "may not provide a highly accurate depiction of deployment of broadband infrastructures for residential service, especially in rural areas."

These well documented short-comings have hamstrung our ability to collect the data necessary for sound policymaking – a practice that continues through our adoption today of the most recent Section 706 Report on deployment of advanced services, which is again based on those old, flawed data collection methods. Recognizing the need for the Commission to improve its data collection practices, Congressional leaders in both the House and Senate have introduced legislation to enhance the information available to policymakers.

While improvements have been a long time coming, I am pleased at the steps we take here, which represent a marked improvement from our past efforts. I am particularly pleased with the Commission's decision to develop a more granular understanding of broadband subscribership by collecting data by speed tier at Census-based levels. This data should also give the Commission a greater ability to correlate subscribership with the demographic information collected by the Census Department, including household income, race, urbanicity, age, gender, and other factors that may be relevant to broadband adoption. Could this effort be further improved? I believe the usefulness of this data would have been greatly enhanced were we to distinguish between business and residential users. I also remain concerned about our visibility into developments in rural areas. Yet, this Order represents a welcome improvement.

I am disappointed that we fail to take affirmative steps to improve our understanding of broadband affordability. To maintain our productivity edge, we must give our citizens communications tools that are equal or greater than those available to our global competitors. Particularly given the growing evidence that citizens of other countries are getting a much greater

broadband value, in terms of price per megabit, it is regrettable that the Commission misses an opportunity to collect useful information about the actual prices available to American consumers. In addition, particularly as availability increases, affordability is likely to be an increasingly important factor influencing broadband adoption. I hope that the Commission can take up these issues, relegated to a Further Notice in this item, in the near future.

Among the commendable steps here is our recommendation to the Census Bureau that a question regarding broadband adoption should be added to the American Community Survey and the Puerto Rico Community Survey. While the ultimate decision rests with the Census Bureau, I believe this issue warrants inclusion given the increasing importance of broadband to virtually every aspect of the way we live our lives.

The Commission also adopts new “speed categories” of broadband for reporting purposes. I am pleased that the Commission finally moves away from its antiquated definition of broadband as 200 kbps per second, which had become something of a running joke. Recognizing that the definition of broadband must evolve as technology evolves is a good first step, although the practical implications of these new categories are less clear.

We also make improvements on the important issue of upload speeds. As consumers and businesses become increasingly empowered as creators of content, services, and applications, it is important that the Commission gather information about what services are available and adopted. The Commission’s new broadband reporting categories would have been improved were they to contain a component of upload speed, but I am pleased that the Commission will at least collect new data on this issue at a more granular level.

I note also that the Commission’s ability to gather and map useful information regarding broadband availability remains somewhat in limbo with these issues pushed to a Further Notice. I do appreciate the Commission’s willingness to seek comment on a proposal to collect the underlying data about broadband availability that providers already make available to the public.

Finally, I would like to thank the Chairman and my fellow Commissioners for tackling this important and complex subject. Many thanks also to the staff of the Wireline Competition Bureau for their efforts to develop this item and for their hard work collecting and analyzing this data on an on-going basis. As I have often stated, having a comprehensive, reliable, and accurate understanding about the state of broadband deployment is the critical first step in a comprehensive effort to promote the availability of broadband services to all Americans. I am hopeful that the changes adopted here will enhance the ability of the Commission and Congress to understand the availability of affordable broadband and to target policy efforts accordingly. For all these reasons, I approve in part, concur in part.