

**STATEMENT OF  
COMMISSIONER JONATHAN S. ADELSTEIN**

*Re: Development of Nationwide Broadband Data to Evaluate Reasonable and Timely Deployment of Advanced Services to All Americans, Improvement of Wireless Broadband Subscriber Data, and Development of Data on Interconnected Voice over Internet Protocol (VoIP) Subscriberhip, Notice of Proposed Rulemaking (2007)*

The Commission must collect accurate and reliable data concerning the status of broadband deployment, availability, affordability, and competition, if we are to adopt effective policies that promote access to broadband services, our charge under the Telecommunications Act of 1996. Too often, I hear complaints about the lack of accurate, comprehensive, and granular broadband data and the quality of the FCC's data gathering efforts. It is the FCC's job to fill in the many blanks. With this *Notice*, the Commission has the opportunity to correct well documented short-comings in our data gathering program that have hamstrung our ability to collect the data necessary for sound policymaking. While it has been a long time coming, we will now have the opportunity to make some welcome improvements after years of foot-dragging.

Given the increasing importance of broadband to our economy and quality of life, we must engage in a concerted and coordinated effort to restore our place as the world leader in telecommunications by making affordable broadband available to all our citizens. To accomplish this task, we must be willing to take a hard look at our successes and failures, and improve our data collection. 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.

Yet, the Commission's current efforts to gauge broadband deployment, access, and affordability fall far short. In its May 2006 report, the Government Accountability Office (GAO) took the FCC to task for the quality of its broadband data. 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." GAO's report makes clear that the FCC has much work to do to improve the quality and scope of its broadband data, as well as its analysis of the availability of affordable broadband services, if it is to satisfy the Congressional mandate in Section 706.

Through this *Notice*, the Commission takes a first step toward a better data gathering and analytical process. The *Notice* seeks comment on whether to alter the Commission's existing definition of broadband, how to collect additional demographic information about broadband subscribers, and how to collect and analyze data on the cost of residential broadband services. To maintain our productivity edge, we must give our citizens communications tools that are equal or greater than those available to our global competitors. We should start by updating our current definition of high-speed of just 200 kbps in one direction to something more akin to what consumers receive in countries with which we compete, speeds that are magnitudes higher than our current definitions. We need to set ambitious goals, shooting for real high-bandwidth broadband deployment, rather than being content to hit targets set almost eight years ago. Particularly given the growing evidence that citizens of other countries are getting a much greater broadband value, in terms of cost per megabit, the Commission must also explore ways to monitor the actual speeds and prices available to American consumers who are capable of obtaining

broadband services. Similarly, the *Notice* seeks comment on how to collect data on broadband availability and affordability in other nations.

Particularly important, the *Notice* also seeks comment on how to better assess broadband availability. As GAO has made clear, the Commission's current practice of basing conclusions about availability on providers' lists of Zip Codes in which they serve at least one customer does not provide sufficient information about the actual deployment of broadband networks, its practical availability for consumers, or the state of competition in given areas. In this regard, I am pleased that the *Notice* seeks comment on how to gather data about broadband deployment, availability, and adoption among Native Americans living on tribal lands. The Commission must explore ways to develop greater granularity in its assessment and analysis of broadband availability, whether through statistical sampling, Census Bureau surveys, or other means. If we are to make sure that all Americans benefit from broadband services, the Commission must do more to assess broadband availability and affordability across our many diverse populations. So, I appreciate my colleagues' willingness to expand the scope of questions raised in this *Notice* and am hopeful that it will provide a record that will allow us to significantly enhance the Commission's data gathering efforts into the status of broadband deployment, availability, and affordability.

Given that the most glaring weaknesses in our data gathering efforts have been well-known for some time, it is disappointing that the Commission only seeks comment on these changes, even as we simultaneously launch an inquiry which will form the basis of our next Section 706 Report to Congress. Our timing suggests that the Commission may not have a revised data gathering program in place in time to better inform our next report. I hope that prediction is wrong because these efforts would enhance the ability of the Commission and Congress to understand the availability of affordable broadband and to target policy efforts accordingly. We should do whatever we can to make sure that we have all the facts before we are required to make the next round of conclusions.