

**STATEMENT OF  
COMMISSIONER MICHAEL J. COPPS**

*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*

For several years now, I have been greatly disappointed by the Commission's broadband data-gathering and presentation. As scholars, industry and the Government Accountability Office (GAO) have documented, our semi-annual statistical reports currently fail to measure even basic concepts such as the extent of broadband deployment across the country (including in rural and tribal areas) and the degree of competition among broadband providers and modalities. Our statistical methodology seems almost calculated to obscure just how far our country is falling behind many other industrialized nations in broadband availability, adoption, speed and price. Indeed, the lack of reliable government data on the present state of our broadband market is a fundamental obstacle to developing a national strategy to reverse our inexcusable broadband performance. Until we know where we stand today, how can we possibly build the broadband future that our nation deserves? And if the FCC doesn't gather this data, who will?

Today's NPRM asks a number of important questions that will allow the FCC to begin reforming its broadband data-gathering. An item like this should have been voted ten years ago. But we take what we can get, and I appreciate Chairman Martin's willingness to work with us to develop a series of questions that will allow the Commission to develop a far more nuanced and reliable picture of our nation's broadband market. I look forward to working with him and my fellow Commissioners to synthesize the comments we receive over the coming months so we can develop rules that will improve our semi-annual broadband statistical reports as well as our section 706 broadband analysis.

Though today's item asks a multitude of important questions—too many to mention here—I would like to focus on certain issues that I believe are of particular importance. First, today's item seeks comment on how the agency should measure broadband speed. For too long, we have defined broadband as 200 kbps in one direction—a measure that was outdated even when it was introduced years ago and that has become increasingly untenable today, especially when one considers what consumers in other countries routinely expect and receive. I look forward to receiving comments on how we can develop more useful measures of speed and also how we can ensure that broadband providers are using comparable methodologies for calculating speed.

Second, today's item states that competitive choice should, ideally, be calculated on a house-by-house and business-by-business basis. It also forthrightly acknowledges the limitations of the Commission's existing methodology, which assumes if one home or business in a ZIP code has broadband, then every home or business in that ZIP code has broadband. No business in its right mind would base decisions on such misleading data—surely the American government should not do so either. I am especially pleased that we seek comment on the feasibility of developing a sampling methodology to develop estimates of competition and broadband deployment in representative urban, suburban, rural, and tribal areas and on using statistical extrapolation to develop a national picture. The groundbreaking mapping and analysis conducted by private-public partnerships like ConnectKentucky—not to mention the example of countries like Japan, which gathers detailed data at the prefecture level—certainly demonstrate that it is possible, with a little elbow grease, to gather far more granular broadband data than we presently do at the FCC. A pretty good idea of what's going on in representative parts of the country strikes me as a far better basis for policy than a largely misleading idea of what's happening everywhere.

Third, today's item seeks information on broadband price—a crucially important piece of information in understanding broadband deployment and in assessing whether consumers are being well served by our current broadband market. After all, it is surely *value*—meaning the relationship between price and measures of quality such as speed and ease of use—that matters most to consumers and ought to matter most to the Commission. I am especially interested in learning how price and value are affected by the degree of competition in an area. We should be able to report the price per bit in representative parts of the country, and to compare these statistics to what consumers receive in other nations. The Commission has for many years considered such factors in its annual analyses of, for instance, video and wireless services—it is well past time that we do so for broadband as well.

Fourth, building upon the point just made, today's item distinguishes between two distinct concepts—whether broadband is *available* and whether consumers have chosen to *adopt* broadband—that the Commission has conflated for far too long.<sup>1</sup> Gathering statistics on both concepts—as well as how the two are correlated with price, speed, value and demographic factors such as age, gender, education, race, income, rural and tribal residence, disability status, and so forth—will allow the Commission, other policymakers, academics, and industry to understand why certain populations have benefited far less than others from the digital revolution. Only when we understand the many factors driving broadband adoption can we ensure that the benefits of this exciting technology become a part of *every* American's life—as they surely should be.

Finally, today's item seeks comment on how we can use international statistics on broadband deployment to better understand and assess our own country's broadband marketplace. Even though our country is undeniably unique in many ways, lessons from abroad may well be relevant to our own situation and we should always have the humility to learn from others.

Despite our late start, today's item nevertheless represents an important step in the right direction. I hope that it represents an ongoing commitment on the part of this agency to improve our data-gathering and presentation. I also hope it isn't too late.

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<sup>1</sup> See, e.g., United States GAO, *Broadband Deployment Is Extensive Throughout the United States, but it Is Difficult to Assess the Extent of Deployment Gaps in Rural Areas*, GAO-06-426 (May 2006).