

**STATEMENT OF
COMMISSIONER JESSICA ROSENWORCEL,
DISSENTING**

Re: *Inquiry Concerning Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion*, GN Docket No. 19-285.

Broadband is more than a technology—it's a platform for opportunity. No matter who you are or where you live in this country, you need access to advanced communications to have a fair shot at 21st century success.

That is why the annual Broadband Deployment Report from the Federal Communications Commission is so important. It's also required by law. Under the Telecommunications Act, each year the FCC must evaluate whether or not broadband is being deployed to all Americans in a reasonable and timely fashion.

Earlier this year, the FCC answered this question in the affirmative. The agency concluded that broadband was being deployed nationwide in a reasonable and timely way. In other words, the agency clapped its hands and pronounced our broadband job done.

I believe the FCC got this wrong. The evidence is all around us. Too many Americans lack access to high-speed service at home. Too many communities across the country are struggling to secure the broadband they need for economic revitalization and growth. Too many rural households and tribal areas fear that they may be forever consigned to the wrong side of the digital divide. In too many urban areas, redlining has led to broadband deserts. Plus, too many students across the country fall into the homework gap because they lack the internet access needed for nightly schoolwork.

As a result, governors, mayors, and legislators across the country are working overtime to extend high-speed service to those outside its reach. Likewise, every week brings new concerns from Members of Congress who in hearing after hearing have chided this agency for its inability to deliver the promise of broadband to communities they represent.

This inquiry was an opportunity to fix what we got wrong in our last assessment. It was an opportunity to get it right—and reexamine whether or not broadband is available to all Americans. We need an honest accounting. This inquiry was the perfect place to do it. But what we adopt here comes up short.

At the outset, we know that the data that informed our last assessment is seriously flawed. After correcting for a massive data fumble, the FCC tallied up broadband and determined that there are only 21 million people nationwide without broadband. But these numbers derive from a methodology with a grave limitation. If a service provider claims that they serve a single customer in a census block, then we assume service throughout. The resulting data systematically overstates service across the country and has been the subject of endless criticism from consumers, carriers, and Congress. As a result, the agency kicked off a new granular data initiative to better understand and map the broadband gaps across the country. But there is no evidence we will use updated numbers here, just a head-in-the-sand commitment to using the same methodology we did last time and a refusal to ask hard questions about what we can do now to ensure our next count is more accurate. *Under these circumstances, how can anyone trust what we conclude?*

Just as importantly, this inquiry misses the mark when it proposes to keep in place the current broadband standard. The future belongs to the bold. History demonstrates that when we set audacious goals, we can do big things. It is time for broadband goals that reflect not just where we are but where we are going. It has been nearly five years since the FCC updated its broadband standard to 25 megabits per second. But new technology comes at us fast. In fact, three years ago this country's largest broadband provider began rolling out gigabit service to just shy of 60 million homes and businesses—a process it completed. This agency needs to keep up. It's time for the FCC to adopt a standard of 100 megabits per

second. I regret we are so unambitious that we do not even consider this here.

Moreover, we need to revamp our thinking about upload speeds. At present, our standard is 3 megabits per second. But this asymmetrical approach is dated. We need to recognize that with extraordinary changes in data processing and cloud storage, upload speeds should be rethought. Download speeds are all about consumption, but upload speeds provide us with opportunities for production. From precision agriculture to video development to interactive data operations—the way we use broadband to create is changing. This is exciting, but our failure to even ask such questions here does not bode well.

Finally, this inquiry fails to explore broadband adoption and its contributing factors, including price, digital literacy, and relevance. If the FCC is serious about conducting a full inquiry into broadband availability nationwide, it should do more to seek comment on these topics.

I hope as this inquiry unfolds the FCC will be open to these ideas. I hope that we can use the record that develops to build a bolder vision for our broadband future. But I fear that the foundation laid by this inquiry is insufficient and the outcome is preordained. I dissent.