

**STATEMENT OF
COMMISSIONER NATHAN SIMINGTON
APPROVING IN PART AND CONCURRING IN PART**

Re: *Inquiry Concerning Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion*, GN Docket No. 22-270, Notice of Inquiry (October 25, 2023).

In addition to sharing Commissioner Carr’s concerns about the misframing of our inquiry, I am also concerned by the suggestion that the FCC adopt a “long-term speed goal” of 1000/500Mbps for the definition of broadband. All else being equal, no one would choose 100/20Mbps service over 1000/500Mbps service, but the vast majority of consumers do not materially benefit from such high speeds, and deploying such high-speed service is not free. A 100/20Mbps connection is fast enough to watch multiple 4K-quality streams, make multiple video calls, and play multiple online games, all at the same time. New applications may one day require more bandwidth, but it is premature to set a target based on hypothetical use cases that may not materialize or, that when they do, might require even more than 1000/500Mbps anyway.

This is not a mere rhetorical concern. Adopting a long-term target of 1000/500Mbps would send the message that in the near future, the FCC will consider speeds below that to be inadequate. By operation of the principles that have long guided our high-cost programs, this would put ISPs on notice that the FCC could soon subsidize competitors in any area where 1000/500Mbps connections are not available. Subsidized competition undermines the already tenuous profitability of rural ISPs, so they will choose to invest their limited resources into serving fewer locations at 1000/500Mbps, thereby protecting themselves from future subsidized competition, rather than into serving more locations at lower but very adequate speeds such as 100/20Mbps or 200/100Mbps. The bottom line is that more Americans would be left unserved because the FCC pursued science fiction instead of sober policy.