STATEMENT OF
COMMISSIONER ANNA GOMEZ

Re: *Inquiry Concerning Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion,* GN Docket No. 25-223, 2026 Section 706 Report (August 14, 2026).

Today, Americans rely on broadband connectivity for work, education, healthcare, community and civic engagement, entertainment, accessing government services, and so much more. Advancements in technology such as Artificial Intelligence (AI) provide significant economic opportunity. When used responsibly, AI has the ability to increase efficiency and productivity for individuals and businesses alike. The consensus about the need to embrace AI has led to overwhelming bipartisan agreement that the United States should become a leader in its advancement. However, access to affordable, reliable high-speed, low-latency broadband is the foundation for access to AI. Without this essential connectivity, communities in rural areas, tribal lands, and low-income neighborhoods that already have the fewest educational resources, the weakest public health systems, and subpar public infrastructure, will be left further behind. That digital divide stifles economic opportunity and perpetuates a cycle of inequality. That is unacceptable.

Affordable, reliable, high-speed connectivity for all is essential to American leadership in the global AI economy. New artificial intelligence applications being developed will need latency below 30 ms[1] and greater uplink capacities to allow for real-time data flow.[2] Government efforts to support broadband deployment should be focused on how we can best meet these needs and prepare the nation for success in the years to come.

In Section 706 of the Communications Act, Congress tasked the Commission with reporting annually on "the availability of advanced telecommunications capability to all Americans" and on "whether advanced telecommunications capability is being deployed to all Americans in a reasonable and timely fashion."[3] Availability of advanced telecommunications capability depends on more than just whether infrastructure has been deployed. Infrastructure is of little value to consumers when it is not usable for high-speed, reliable connectivity or when it is not affordable. Though Congress only required the Commission to report on deployment, this requirement is a floor, not a ceiling. Its purpose is to inform Congress on the state of broadband connectivity across the country. The report at hand covers only infrastructure deployment and consequently does not address other important pieces of the puzzle, affordability and usability, which tie directly into the purpose of broadband deployment: ensuring that everyone is connected. Omitting affordability and usability from the analysis was a policy decision with which I disagree.

For satellite broadband specifically, usability presents significant concerns. Thus, it is misleading to state that 99.7% of the U.S. population has access to satellite broadband at 100/20 Mbps. While satellite service is widely available to most Americans, its usability is limited by physical obstructions to

[1] Nokia, *Build First, Lead Forever: Why AI Infrastructure is America's Next Advantage*, https://www.nokia.com/asset/215238/ (*Build First, Lead Forever*) (last visited Aug. 11, 2026).

[2] *Id*.

[3] 47 U.S.C. § 1302(b).

the line of sight,[4] capacity constraints in areas with high demand,[5] and network congestion that can result in slower speeds.[6] In 2025, fewer than half of satellite broadband users actually experienced speeds of 100/20 Mbps.[7] Satellite users in fewer than half of the states were able to get median upload speeds of 20 Mbps.[8] Users typically experience download speeds between 45 and 280 Mbps and upload speeds between 10 and 30 Mbps.[9] In terms of performance, satellite service falls behind major fiber and cable operators in rural and urban areas and behind most fixed wireless providers in rural areas.[10]

As acknowledged by industry, service reliability declines during periods of congestion and actual speeds depend on location, time of day, and type of service plan.[11] As demand for satellite connectivity grows, capacity limitations also become more apparent. In areas of the country where population density exceeds 6.66 households per square mile, satellite may not provide service at 100/20 Mbps.[12] Such low subscriber density is not reflective of the entire country.[13] Perhaps more concerning is the fact that satellite capacity limitations may raise costs for consumers. In areas with a high density of users, service providers have imposed one-time network demand fees of up to $1,500 affecting new customers and those locating to the higher-demand areas.[14] Satellite broadband service also requires a clear line of sight between the user's device and the provider's satellite,[15] meaning that physical obstructions such as buildings, trees, and poles make connectivity more challenging.[16] In remote areas including Alaska,

[4] Shira Ovide, The Washington Post, *Elon Musk's Starlink internet works great if hardly anyone uses it* (July 18, 2025), https://www.washingtonpost.com/technology/2025/07/18/starlink-internet-satellite-speed-elon-musk/ (*Washington Post Satellite Speed);* Federal Communications Commission, *Getting Broadband Q&A*, https://www.fcc.gov/consumers/guides/getting-broadband-qa (last visited Aug. 13, 2026) (*FCC Consumer Guide*).

[5] Sacha Meinrath et al., X-Lab, *Starlink Capacity Analysis v0.2* (July 28, 2025), https://thexlab.org/wp-content/uploads/2025/07/Starlink_Analysis_Working_Paper_v0.2.pdf (*Starlink Capacity Analysis v0.2*); Omar Gallaa, CNET, *Some Starlink Customers Report Getting Hit With Massive Demand Surcharge* (July 15, 2026), https://www.cnet.com/tech/services-and-software/starlink-customers-report-demand-surcharges/ (*July 2026 CNET Starlink Surcharge*); Starlink, *What is a Demand Surcharge?,* https://starlink.com/sb/support/article/63d885d3-c269-21f9-69d6-3ed1b2fd18e9 (last visited Aug. 13, 2026) (*Starlink Demand Surcharge Webpage*).

[6] Starlink, *Starlink Specifications*, https://starlink.com/legal/documents/DOC-1470-99699-90 (last visited Aug. 13, 2026) (*Starlink Specifications*).

[7] Sue Marek, Ookla, *Starlink Hits New Highs in the U.S.* (May 5, 2026), https://www.ookla.com/articles/starlink-hits-new-us-highs.

[8] *Id.*

[9] *Starlink Specifications.*

[10] Fiona Armstrong-Mills, OpenSignal, *Is Starlink a scalable fix for U.S. digital inclusion or an access band-aid?* (April 15, 2026), https://insights.opensignal.com/2026/04/is-starlink-a-scalable-fix-for-us-digital-inclusion-or-an-access-band-aid/dt.

[11] *Starlink Specifications.*

[12] *Starlink Capacity Analysis v0.2.*

[13] Rysavy Research, *Broadband Comparison: Fiber, Cable, Wireless, and Satellite* (July 21, 2025), https://rysavy.com/wp-content/uploads/2025/07/2025-07-rysavy-broadband-comparison.pdf.

[14] *July 2026 CNET Starlink Surcharge; Starlink Demand Surcharge Webpage.*

[15] *FCC Consumer Guide.*

[16] *Washington Post Satellite Speed.*

typical latency is over 100 ms,[17] which exceeds the 30 ms latency benchmark that has been identified as optimal for most artificial intelligence applications that are being developed.[18]

This report also abolishes without replacement the future benchmark of 1,000/500 Mbps for broadband speed established in the 2024 Section 706 Report, arguing that future benchmarks may violate the Commission's obligation to remain technologically neutral. Lowering standards to ensure certain technologies can meet a benchmark is the opposite of technological neutrality. Technological neutrality requires that we evaluate all technologies against the same standard and support the ones that perform best. We need not lower the standards or get rid of them entirely to allow certain technologies to flourish despite their shortfalls. Moreover, in the Rural Digital Opportunity Fund (RDOF) Report and Order, the Commission established 1,000/500 Mbps as the standard for the Gigabit performance tier.[19] More than 85% of RDOF winners have already committed to provide gigabit speed service.[20] If this is the standard that funding awardees are held to, other providers should be working towards providing service at the same speeds. The Commission should be uplifting and supporting the use of technologies that provide affordable, reliable, high-speed connectivity that meets the needs of today and tomorrow.

The report correctly concludes that our work closing the digital divide is not done. Challenges to service quality, capacity, and affordability still exist, providing a clear indication that there is more work to be done. The Commission's programs, including those under the Universal Service Fund, continue to be essential for ensuring that everyone across our nation has access to affordable, reliable, high-speed connectivity.

I thank the Chairman's office and the Wireline Competition Bureau for their work on this item and for working with me to implement edits that identify some of the usability limitations of satellite broadband service. However, because I believe that any inquiry into the availability of advanced telecommunications capability to all Americans should include a discussion of affordability and usability, I respectfully concur.

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[17] *Starlink Specifications*.

[18] *Build First, Lead Forever*.

[19] 47 CFR § 54.805(b)(3).

[20] Universal Service Administrative Co., *Rural Digital Opportunity Fund*, https://www.usac.org/high-cost/funds/rural-digital-opportunity-fund/ (last visited Aug. 13, 2026).