



**INDEPENDENT TELEPHONE & TELECOMMUNICATIONS ALLIANCE**

September 17, 2008

Marlene Dortch  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20054

**Re: Inquiry Concerning the Deployment of Advanced  
Telecommunications Capability to All Americans in a  
Reasonable and Timely Fashion, and Possible Steps to  
Accelerate Such Deployment Pursuant to Section 706 of the  
Telecommunications Act of 1996**

**GN Docket No. 07-45**

The Independent Telephone & Telecommunications Alliance (ITTA) comments on the Petition for Reconsideration filed in the above-captioned docket by Consumers Union, Consumer Federation of America, and Free Press (Petitioners). The Petitioners challenge the Commission's finding that advanced telecommunications capability is being deployed to all Americans in a reasonable and timely fashion. By contrast, ITTA supports the Commission's finding, notwithstanding the fact that much work remains to deploy broadband throughout the Nation.

ITTA members are mid-size local exchange carriers that provide a broad range of high-quality wireline and wireless voice, data, Internet, and video services to 30 million access lines in 45 states. ITTA member companies are committed to the further deployment of broadband throughout their respective service areas, and have demonstrated a significant commitment to bring subscribers the latest and best in communications services.

The Petitioners argue that the Commission failed to consider sufficiently the role of upload speeds when measuring the extent of broadband deployment. ITTA agrees that upload speeds are a significant factor in broadband service. But, like any evolutionary technology, broadband is a not a static service. Rather, it is a dynamic offering, and advances in bringing faster download capabilities to rural America have been mirrored by proportional developments in increasing upload speeds. Generally, download speeds have exceeded upload capabilities as broadband has evolved, and the Commission should not determine that the success of broadband deployment is measured by equal download and upload speeds.

In a Federal report, the Government Accountability Office (GAO) found that "[t]he most frequently cited cost factor affecting broadband deployment was the population density of a market," and stakeholders reported to the GAO that "the cost of building a broadband infrastructure in areas where people live farther apart is much higher than building infrastructure to serve the same

number of people in an urban setting.”<sup>1</sup> The GAO also found that “terrain was also frequently cited as a factor affecting broadband deployment decisions.”<sup>2</sup> As indicated in statements by broadband stakeholders to the GAO, “infrastructure build-out can be difficult in mountainous and forested areas because these areas may be difficult to reach or difficult on which to deploy the required equipment.”<sup>3</sup>

ITTA members serve mostly rural and suburban areas where low population density and natural terrain can converge to create costly broadband deployment scenarios. In any given network, deployment can be configured to provide equal download and upload rates. Since, however, available network capacity must be allocated among download and upload, carriers look toward general Internet usage trends to determine the proper mix of upload and download capabilities. In ITTA markets, demand for download is greater than upload. Therefore, ITTA members providing broadband service offer greater download speeds than upload speeds. In instances in which a user requires a higher upload capability, ITTA members are able to provide individually-tailored offerings to meet that customer’s needs. Overall, ITTA member broadband deployments match market demand consistent with available resources.

As noted above, much work remains to bring broadband to the Nation, and that statement will likely be true in any given future, since the evolution of broadband to faster speeds and greater capabilities will produce a moving target and a job that is, in reality, never complete. The success of National broadband deployment, however, must not be measured on predictions, but on achievements. And in that regard, the member companies of ITTA are among those who “have done a commendable job of providing voice and broadband services to their subscribers,”<sup>4</sup> and who look forward to working with the Commission to enable greater broadband deployment throughout the Nation.

Respectfully submitted,

*s/Curt Stamp*  
Curt Stamp  
President

---

<sup>1</sup> “Broadband Deployment is Extensive Throughout the United States, But it is Difficult to Assess the Extent of Deployment Gaps in Rural Areas,” Government Accountability Office, at 19 (Washington 2006) (GAO Report).

<sup>2</sup> GAO Report at 19.

<sup>3</sup> GAO Report at 19.

<sup>4</sup> *High-Cost Universal Service Support, Federal-State Joint Board on Universal Service: Recommended Decision*, WC Docket No. 05-337, CC Docket No. 96-45, FCC 07J-4, at para. 39 (rel. Nov. 20, 2007) (November 2007 Recommended Decision) (internal citation omitted).