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Federal Communications Commission
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Washington, D.C. 20554

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Comments on National Broadband Plan from a Coalition of Public Interest Groups

A coalition of local and national public interest groups offers these abbreviated comments on the National Broadband Plan (NBP). We also intend to file additional remarks during the reply comment period that ends on July 7, 2009.

In early 2009, a broad cross-section of local, grassroots, and national public interest organizations joined together to attempt to articulate a shared vision of the elements that must be included in a successful National Broadband Plan. Beginning with community forums and outreach in San Antonio; Philadelphia; Oakland; New York City; Seattle; Burlington, Vermont; and Fort Mitchell, Kentucky, local grassroots constituents and advocates for broadband access put forth their ideas for Internet policies that would best serve their diverse communities. The groups then convened to distill the information and ideas gathered at these events into several key policy prescriptions that all groups supported. During this process, national broadband policy experts at the nation's leading public interest media advocacy groups provided valuable guidance and advice. However, the resulting paper, to be published fully at a later date, remains an accurate reflection of the legitimate voices of grassroots advocates from outside the Beltway, and thus makes a unique and valuable contribution to the inside-the-Beltway policy debate. We offer a summary of the recommendations and forthcoming paper in these comments.

While not a comprehensive recommendation on all of the broadband and Internet policies required, this paper does articulate a few key policies and principles that unite a large and diverse coalition of public interest groups. We are united in recommending that the National Broadband Plan incorporate these core principles:

- 1. Broadband communications is a fundamental right.** To ensure this fundamental right, there must be universal and open, non-discriminatory access to high-speed and high-quality broadband. Mobility, abundance, and privacy of broadband should be top priorities. Policy recommendations that should be part of the NBP should include reform of the Universal Service Fund to include broadband access, strengthening of federal policy on network non-discrimination, promotion of symmetrical speeds for broadband networks, stronger privacy

protections for users, and policies that treat mobile devices as critical broadband access points.

- 2. Good policy must be well informed.** Federal policymakers must have access to reliable data on where broadband presently exists, at what speeds, of what quality, by what provider, how it is used by consumers, why certain consumers do not use it, and how other consumers integrate it into their lives. These data must be as verifiable, as granular as possible, and should be made available in raw form on the Internet for analysis by the public. Data should not be considered “proprietary” if it is available to the public in a non-aggregated form, and federal spectrum must be better mapped to identify where, how and when these resources are used.
- 3. Policy should promote competition, innovation, localism, and opportunity.** Locally-owned and –operated networks support these core goals of Federal broadband policy, and therefore should receive priority in terms of Federal support. Structural separation of ownership of broadband infrastructure from the delivery of service over that infrastructure will further promote these goals.
- 4. Government should use public resources and assets wisely.** Policymakers should seek to leverage to the maximum extent possible the use of public resources and assets such as spectrum, fiber, and rights-of-way to achieve the goal of universal broadband access to the Internet. Publicly-subsidized networks should be available for interconnection for non commercial use, government should not rely on auctions of publicly owned spectrum to make those resources available for broadband use, local government should retain all authority to deploy and manage communications networks, and the Chief Technology Officer should look towards the spending of other federal agencies as opportunities to expand broadband access and adoption.
- 5. Federal policy must stress digital inclusion and the service of traditionally disenfranchised communities.** Stimulating broadband supply is necessary but not sufficient to achieve the goal of universal broadband. Policymakers must also promote digital inclusion initiatives to stimulate broadband demand and ensure that all U.S. residents have access to the digital skills and tools necessary to take advantage of the Internet’s enormous potential benefits. This benefits not just those who would otherwise be left behind on the wrong side of the Digital Divide; it benefits all broadband users. Establishment of local and national Digital Inclusion Councils could work with other agencies and programs to promote digital inclusion principles in the fulfillment of their missions. Media literacy curriculum for secondary schools should be established, along with technology literacy and digital media production.

These comments are filed by the Media and Democracy Coalition on behalf of the organizations listed below.

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