



Consumer Federation of America

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**STATEMENT OF DR. MARK COOPER
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ON THE NATIONAL BROADBAND PLAN**

**GETTING STARTED:
SIGNIFICANT FIRST STEPS TO REDUCE DIGITAL EXCLUSION
AND PROMOTE DIGITAL EVOLUTION IN AMERICA**

Over the course of the past year the Consumer Federation of America has urged the Federal Communications Commission to take a pragmatic, real world approach to the urgent national problem of making a world-class broadband network truly universal in America. With one-third of U.S. households now three generations behind in technology adoption and the U.S. lagging other advanced industrial nations, achieving universal service would not only be an immense benefit to those households, it would provide a powerful boost to the economy.

We see today's National Broadband Plan report to congress as a significant first step in the right direction. It strikes a good balance between what needs to be done in the long-term and what can be done in the immediate future. Given the complete absence of policies to address the digital divide and promote competition in broadband in the past decade, this is an ambitious agenda and a good starting point for responding to the challenge confronting the U.S. communications network.

The fact that the Federal Communications Commission intends to quickly launch dozens of proceedings to implement these first steps is good news. In a democracy of 300 million people we must live by the rule of law. To change society, we must change the rules. To change the rules, we must have rulemakings that comply with the Administrative Procedures Act. Above all, that means the public should have the chance to comment on the actual rules that will be implemented. It would have been inappropriate for the FCC to present detailed policy prescriptions without a full hearing record developed in individual proceedings. There will certainly be lots of devils in the details, but the more rulemakings and the sooner they get started, the better.

The fact that this moderate proposal has been attacked by industry-funded think tanks only serves to remind us that even the most modest proposals to promote the public interest, protect consumers and help ordinary Americans meet their need for every day necessities in an affordable manner is unacceptable to the corporations that dominate the industry.

The Consumer Federation of America (CFA) is an advocacy, research, education and service organization made up of 300 nonprofits from across the United States. CFA has provided consumers a well-reasoned and articulate voice in decisions that affect their lives since 1968. CFA's professional staff gathers facts, analyzes issues, and disseminates information to the public, policymakers, and rest of the consumer movement.

PUBLIC INTEREST ASSESSMENT OF THE NATIONAL BROADBAND PLAN

Recommendation	Plan Action	Recommendation	Plan Action
<u>General Approach</u>		<u>Spectrum</u>	
Identify the problem	Good start	Expand unlicensed	Weak mention
Recognize policies needed	Good start	Develop secondary markets	Mention
		Enforce use it or lose it	No mention
		Public service conditions	Weak mention
		Promote middle mile access	Good start
		Data roaming	Good Start
<u>Universal Service</u>		<u>Community-focused Activity</u>	
Adopt adequate facility Std.	Good start	Create local hotspots	Ongoing
Use High Cost fund	Good start	Develop digital literacy	Mention
Use Lifeline-linkup funds	Good start	Leverage anchor institutions	Good start
Expand USF base	Mention	Reform middle mile	Mention
Address middle mile costs	Good start		
Target grants and loans	Mention		
Adopt least cost approach	No mention		
Reform USF	Good start		
<u>Competition</u>		<u>Consumer Protection</u>	
Advance network neutrality	Ongoing	Transparency	Mention
Improve access to facilities	Weak mention	Privacy	Mention
Open devices	Ongoing		
Open set top boxes	Good start		
Collect/Analyze Data	Weak mention		