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Before the
DEPARTMENT OF COMMERCE
National Telecommunications and Information Administration

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In the Matter of	)	
	)	
National Broadband Research Agenda	)	Docket No. 160831803-6803-01
	)	

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COMMENTS OF THE
UNITED STATES TELECOM ASSOCIATION

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The United States Telecom Association (USTelecom)[1] is pleased to submit its comments in response to the National Telecommunications and Information Administration ("NTIA") Request for Public Comment on potential research topics for the National Broadband Research Agenda.[2] In the Request for Comments, NTIA seeks recommendations from all members of the research community to support the development of the Agenda in order to identify new opportunities for cutting-edge research and analysis, and pathways to foster a collaborative research environment that includes stakeholders both within and outside of government.[3]

USTelecom commends NTIA's and the National Science Foundation's (NSF) commitment to developing a National Broadband Research Agenda that includes input from not only other federal agencies but also the wider broadband community in order to outline a strategic plan that not only will provide research into new technologies, but will also promote coordination and collaboration in data collection practices and policies among stakeholders that will help shape the future of broadband. This

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[1] USTelecom is the premier trade association representing service providers and suppliers for the telecom industry. Its diverse member base ranges from large publicly traded communications corporations to small companies and cooperatives – all providing advanced communications service to both urban and rural markets. USTelecom members provide a full array of services, including broadband, voice, data and video over wireline and wireless networks.

[2] *National Broadband Research Agenda,* NTIA Docket No. 160831803-6803-01, 81 Fed. Reg. 62,679 (Sep. 9, 2016) (Request for Comments).

[3] *Id.*

sort of forward looking policy making objective will be important to supplementing current ongoing research that ultimately improves broadband deployment. USTelecom supports these laudable efforts.

Topic 2: Broadband Access and Adoption

The current broadband adoption gap is significant. Not only is it larger than the deployment gap, but according to data from NTIA's July 2015 Computer and Internet Use Supplement to the Current Population Survey, 33 million households (27 percent of all U.S. households) did not use the internet at home and 26 million households—one-fifth of all households—were offline entirely, lacking a single member who used the internet from any location in 2015. This situation points to an urgent need for further research to better understand broadband adoption. Understanding the factors that contribute to the broadband adoption gap is the key to helping close the digital divide.

In order to improve this adoption lag, USTelecom recommends that NTIA and NSF broaden the analysis to further study of the "why," in terms of barriers to adoption, and "how," in terms of how people are using their connections and whether they have the requisite skills to harness the power of broadband. It is our contention that digital literacy is significantly under-studied and therefore, the research agenda should focus more on these issues, ideally in partnership with experts working to connect and train the unconnected. In particular, more group-specific studies should be conducted to tease out community-specific barriers, concerns, etc.

In particular the following questions should be explored through the National Broadband Research Agenda:

- What types of programs to increase broadband adoption have been successful and why? How can these programs be evaluated and studied to determine effectiveness? What type of metrics should be used?

- Further research into methodologies used to identify non-adopters. Are surveys effective? Is the 477 data collected useful? Are current methods of gathering this data working or suggestions to improve?

- What type of initiatives can help address the relevancy issue (not interested or don't need internet connection) – which is the #1 barrier to broadband adoption?

- What role can/should government play in supporting effective broadband adoption programs?

- In what way can local rights-of-way practices be improved upon in order reduce costs and delays that hamper broadband deployment and adoption?

Topic 4: Opportunities for Federal Leadership in Data Collection and Research

With respect to Question 17 and more generally in this section of the request for comments, NTIA seems to be seeking to make data collection efforts more robust. While we support the efforts by researchers to have access data that will be useful to them in improving broadband deployment and adoption, we have concerns that imposing additional reporting requirements on ISPs would be burdensome for providers. ISPs already have significant reporting obligations and any new requirements could serve to raise costs to a level that would negatively impact the consumer and thereby adoption. In addition, we have concerns about potentially being required to provide company proprietary information to as part of a government data collection effort. Carriers have in the context of other programs been understandably resistant to sharing proprietary information that could harm their business interests in a very competitive market. Therefore, we ask that NTIA carefully consider implementing any additional data collection requirements that will imposes additional costs and/or burdens on service providers.

USTelecom appreciates the opportunity to provide input in this process. The future of broadband deployment is dependent on efforts such as this one that seek to better understand the obstacles to broadband access and adoption.

Respectfully submitted,

UNITED STATES TELECOM ASSOCIATION

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