May 18, 2020

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street NW
Washington, DC 20554

Re: Local Officials Met with Commissioner Jessica Rosenworcel on May 14, 2020

Dear Ms. Dortch:

Next Century Cities is a nonprofit 501(c)(3) coalition comprised of over 200 member municipalities across the United States that works to bring fast, affordable, and reliable broadband to residents. We represent local elected officials and their appointees, advocating for telecommunications policies that support high-speed connectivity in every community.

On April 30, 2020, Francella Ochillo, Ryan Johnston, Lukas Pietrzak, and Brittany-Rae Gregory on behalf of Next Century Cities; Colman Keane on behalf of Fort Collins, Colorado; Pete Hoffswell on behalf of Holland, Michigan; Rebecca Landry on behalf of Keene, New Hampshire; Jeanna Holm on behalf of Los Angeles, California; and Alice Lawson on behalf of Seattle, Washington, participated in a video conference with Commissioner Jessica Rosenworcel, her Chief of Staff Travis Litman, and her Special Assistant Jessica Martinez. Local Officials shared network and performance updates for their respective communities. Local officials also cited concerns related to inadequate broadband speeds, pole attachment policies, accommodating distance learning, supporting municipal network models, and improving broadband mapping data.

Our members agreed that the current global health crisis has shown how broadband access has transformed from something once thought of as a luxury into a necessity. This is especially the case in rural and underserved urban areas where providers may be hesitant to provide service because of deployment challenges or low consumer counts. As Rebecca Landry, IT Director and Assistant City Manager for Keene, New Hampshire, stated “providers are extremely open that because of our low population density, they have little interest in providing service.” While the Commission has taken great strides during the pandemic to bring connectivity to those who need it, we must all think of how we are to maintain and increase connectivity solutions after the emergency has passed.

One of the issues that remains a top priority for our members is keeping students connected and providing them with access to distance learning programs. Jeanne Holm, Chief Data officer for Los Angeles, California, explained that programs, such as “tech-to-go,” help Los Angeles residents find affordable internet access. However, she stated that the disparity in connectivity between areas of the city are such that some areas have up to 98% connected whereas others are less than 50%. She noted that the Unified School District for Los Angeles has over 650,000 students and, of those students, 15,000 of them...
have not checked in to their online classes since the beginning of their distance learning initiatives. The City is also concerned the lack of broadband access in the home contributes to why over 40,000 students in their municipality are not checking in daily.

Furthermore, Colman Keane, Broadband Executive Director for **Fort Collins, Colorado**, stated that while they have had a successful launch of their fiber to the home program 40% of people within their footprint, especially those in mobile home parks, may not have wireline access to the internet. He noted that Fort Collins is using hotspots and other portable connectivity solutions to connect students and families that need broadband access.

Pete Hoffswell Superintendent of Broadband Services for **Holland, Michigan**, explained how the [Michigan Moonshot Broadband Framework](#) is working to connect students in need. He noted how students in Holland and across Michigan that do not have access to broadband or cellular networks at home may be forced to sit alongside the road or in school and library parking lots to get a signal to complete their homework. Noting that modern lesson plans are built for students with broadband, Mr. Hoffswell concluded by telling the Commissioner that he hopes that Michigan’s continued work will not only help students connect, but will help all citizens in Michigan get affordable and reliable access.

Several NCC members shared their appreciation for being able to discuss how broadband access impacts education with the Commissioner who coined the term “homework gap.” Additionally, NCC has documented concerns about how students in underserved areas struggle to compete when their connections at home cannot handle multiple high bandwidth applications being used concurrently.

Access to infrastructure is also imperative to providing reliable and low-cost internet access. Ms. Landry noted that, in Keene, they do not operate any municipal utilities and there is no municipal reserved space on telephone poles. That limits Keene’s ability to create competition in the broadband market and, as a result, its citizens pay up to five times more than surrounding areas for broadband access assuming that they can get it at all. Ms. Landry explained why this highlights the need for “one touch make ready” policies that may help ease concerns of incumbent providers and allow for quicker deployment of new broadband networks.

Several members stated that when providers were unwilling or unable to provide broadband to their communities, their communities took it upon themselves to connect their citizens. As Mr. Hoffswell noted, the City of Holland has operated its municipal network for 25 years. Holland’s network has since attracted many new citizens and businesses to the area. He stressed that as federal relief funds are appropriated, resources should not be used to discourage municipal build-out. Moreover, Mr. Keane highlighted the progress that Fort Collins has made bringing fiber to over 60% of the population in their network footprint. Importantly, Mr. Keane noted some challenges in access to residents in mobile home communities, but was optimistic that Fort Collins would be able
to provide fiber to the premises connections for these communities quickly and affordably.

A majority of our members stated that current minimum broadband speeds are insufficient to meet the current demands placed on residential networks. There was unanimous agreement that broadband is essential for working, learning and interacting with friends and family. Recent increases in usage has led to speed decreases across the nation which often translates to strained connections for consumers. Mr. Keane noted that in some areas of Fort Collins, DSL speeds are still prevalent and utilizing speeds between 3 Mbps and 10 Mbps downstream. At those speeds, students and parents are simply unable to learn and work from home.

As we discussed, it is time for the Commission to not only revisit minimum speeds, but to introduce symmetry into its benchmark. While download speeds are important for the consumption of content and downloading data, upload speeds play a critical role in videoconferencing, content creation, and gaming. Slow upload speeds can lead to choppy video calls and long wait times for students seeking to upload homework. In short, local officials are calling for an update, not just in speeds, but for network symmetry as well. The Commission has the responsibility to listen and respond for the betterment of national networks.

Finally, our members inquired about the race to 5G and how we can implement deployment strategies that promote digital equity. Alice Lawson, Broadband & Cable Manager for Seattle, Washington, expressed concern that 5G connectivity would only be deployed in urban areas and providers would skip deploying to rural communities as a result of cost and limitations of millimeter wave small cell technology. Current 5G deployment plans are utilizing millimeter waves that do not propagate well over long distances. This disincentivizes this type of small cell deployment in rural areas where the spacing between poles is larger than in urban areas. It follows that urban areas will be outfitted with 5G speeds well before rural areas, if they ever see them at all.

Next Century Cities supports the Commission’s proposals to open up mid-band spectrum for 5G uses. This spectrum propagates over larger distances and will be more cost effective in bringing 5G speeds to rural America. As 5G deployment becomes a priority for carriers, the Commission should consider making the grant of spectrum licenses for 5G uses on plans that guarantee buildout to reach areas with smaller populations.

Local officials who are addressing connectivity problems and impacted citizens every day appreciated the opportunity to share their community’s perspective with Commissioner Rosenworcel’s office and have them documented on the record. These leaders look forward to working with the agency to develop policies that improve connectivity outcomes for their residents.
Respectfully submitted,

/s/ Francella Ochillo  
Francellla Ochillo  
Executive Director  
Next Century Cities

/s/ Ryan Johnston  
Ryan Johnston  
Policy Counsel  
Next Century Cities

cc: Commissioner Jessica Rosenworcel  
cc: Travis Litman  
cc: Jessica Martinez