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WRITTEN COMMENTS OF THE NEW ENGLAND CABLE & TELECOMMUNICATIONS  
ASSOCIATION, INC. ON HOUSE ENERGY & TECHNOLOGY'S MEMO ON  
CORONAVIRUS RELIEF FUNDS

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NECTA is a five-state regional trade association representing substantially all private cable telecommunications companies in Vermont, Connecticut, Massachusetts, New Hampshire, and Rhode Island. In Vermont, NECTA represents Charter Communications, Comcast, and Waitsfield and Champlain Valley Telecom. Our members serve 185 Vermont municipalities with broadband, video, voice, and home security and automation services. Over the past decade, our members have collectively invested over \$200 million developing state of the art networks in Vermont.

NECTA members have played a critical role in connecting Vermonters. Today, we provide high-speed broadband to 155,000 homes and businesses through approximately 9,000 miles of fiber. Moreover, our companies are identifying opportunities to expand their networks to even more consumers. Last month, in response to the COVID-19 crisis, Comcast announced a plan to serve an additional 430 homes and businesses by the end of 2020. This plan is independent of any franchise requirement.

During this unprecedented crisis, when we are living and working at home, our ability to access information, education and sometimes even food is reliant on the internet. We acknowledge that for many Vermonters, that vital connection is still out of reach. As broadband service providers, we know that our greatest obligation is to make those connections possible through fast and reliable internet service, in good times or during a pandemic.

Recent data tells us two things: that our networks are strong – we have built the capacity to meet the demand for Zoom meetings, distance learning, telemedicine, binge-watching and how-to videos for baking bread. NCTA, the Internet and Television Association, recently launched a dashboard of aggregated data from cable internet service providers to offer an ongoing depiction of how cable broadband networks are faring.<sup>1</sup> For Vermont, the data since March 1<sup>st</sup> reveals that although downstream usage has increased nearly 19 percent and upstream usage has increased nearly 40 percent, consumers have experienced no speed reductions to meet this significantly elevated peak demand. Even with a greater reliance on applications like video conferencing in

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<sup>1</sup> <https://www.ncta.com/COVIDdashboard>

the wake of COVID-19, upstream traffic is still demanded far less than downstream. But the data also exposes a gap: some Vermonters still don't have access to high speed broadband.

We are well-suited to partner with Vermont to turn federal dollars into critical infrastructure because we have done it before. Vermont has an existing program that has proven successful in encouraging deployment of high-speed broadband to unserved addresses, the Connectivity Initiative.

Under Governors Shumlin and Scott, Vermont awarded Connectivity Initiative grants to reach hundreds of unserved addresses in multiple rural communities. These network construction grants, serving only unserved areas, is a model for success in other states. In Massachusetts, under the Massachusetts Broadband Institute (MBI), a public private partnership delivered sustainable and affordable broadband solutions on a large scale to previously unserved locations. Of the 53 communities defined by MBI in 2016 as either completely or partially unserved, only one town remains completely unserved, 17 projects are completed, and the other communities are now working towards successful broadband connectivity. Charter and Comcast were the selected provider in nearly half of these MBI communities. By providing internet speeds meeting or exceeding the FCC's definition of broadband to residents in unserved communities, it allows these people to access the communications tools, educational resources, and content they need to fully participate in the 21<sup>st</sup> century economy.

NECTA appreciates the Energy and Technology Committee's recognition that Connectivity Initiative grants are an effective use of Coronavirus Relief Fund (CRF) dollars to expand broadband access. However, altering the Connectivity Initiative parameters to exclude providers that do not offer a 100/100 symmetrical product today limits the opportunity to get projects out the door and more Vermonters connected.

Focusing on a number like 100/100 symmetrical sounds high but provides no meaningful benefits for Vermonters over today's technologically advanced hybrid-cable networks and does not reflect consumer demand. Such a focus appears to have a singular intent: to eliminate cable providers and support only fiber to the premises. Instead, the state should focus on the services needed by Vermonters and target its efforts at ensuring every household has access to broadband that can provide those services. At a time when connectivity is more important than ever, when our members are ready to deliver high-speed broadband today and are preparing to roll out 10G in the future over existing infrastructure, this exclusive rather than inclusive approach to deployment is difficult to reconcile. Our services are provided over networks consisting primarily of fiber and coaxial cable – a hybrid fiber coax network. Those networks are supported by cutting edge DOCSIS technology which drives today's Gigabit speed offerings and tomorrow's 10G capabilities. Public policy requiring or favoring a fiber to the premise solution over our members' services fundamentally misconstrues the current and potential reliability and speeds of these networks. Given the Gigabit speed offerings of our companies, we provide products that far and exceed 25/3mbps speeds.

Additionally, internet usage data proves that 100/100 symmetrical does not reflect actual consumer demand or the way consumers use the network. Just this week, NCTA released a

report highlighting how downstream traffic is still the dominant path that data is traveling on the internet<sup>2</sup>.

Our networks are “future-proof”. This is evidence by 18 to 24 months of investment planning our companies make to ensure their networks far exceed today’s aggregate customer demand. Today, cable operators are starting to launch a next-gen network initiative that aims for symmetrical speeds of 10 Gigabits with low latency and advanced security. This may seem theoretical but the roadmap to delivering this service has been in place for years with a fiber rich broadband network that is already capable of providing up to 1 gigabit speeds to 80 percent of U.S. homes, including to all Vermont customers. By upgrading these existing networks with a combination of new hardware, software and other engineering techniques, our networks will be capable of meeting future consumer demand and will not require a massive and protracted network overhaul.

It is not just about what our networks will deliver in the future, it is what they are capable of today. Any Vermonter in NECTA member service territories can choose from a variety of plans to suit their needs, whether that is basic internet browsing, distance learning, working from home, or streaming Netflix. Vermonters can choose from plans that are capable of providing speeds of up to 2 Gigabits. Collectively, this variety of plans exceeds the FCC definition of high-speed broadband currently defined as 25/3.

For example, below is a menu of existing speed options for two of our members, Charter Communications and Comcast. For Vermont, these are the same cutting-edge product offerings and speeds for the same prices as their customers in Boston’s Back Bay or the financial district in Manhattan.

**Comcast Speed Tiers**

<b>Tier</b>	<b>Speeds</b>
Internet Essentials	25Mbps/3Mbps
Performance Starter	25 Mbps/3 Mbps
Performance	100 Mbps/5 Mbps
Performance Pro	200 Mbps/5 Mbps
Blast!	300 Mbps/10 Mbps
Extreme Pro	600 Mbps/15 Mbps
Gigabit	1 Gbps/35 Mbps
Gigabit Pro	2 Gbps/2 Gbps

**Charter Speed Tiers**

<b>Tier</b>	<b>Speeds</b>
Spectrum Internet Essentials <sup>3</sup>	30 Mbps/4 Mbps
Spectrum Internet	100 Mbps/10 Mbps
Spectrum Internet Ultra	400 Mbps/20 Mbps
Spectrum Internet Gig	940 Mbps/35 Mbps

<sup>2</sup> <https://www.ncta.com/whats-new/downstream-traffic-still-dominates-our-lives>

<sup>3</sup> Subject to eligibility

To be clear, no other state requires 100/100 symmetrical as a floor to broadband investment. The vast majority of states that delineate any specific speed establish 25/3mbps as a floor to define unserved areas. Further, Vermont's neighboring states like Massachusetts and New Hampshire have proven that building a successful public private partnership that uses this same FCC definition of broadband as an entry point, is technology neutral, targets truly unserved areas, and has an open and public process so providers of all kinds can participate is a model for success. The more providers who participate and submit bids under this inclusive policy approach, the more solutions will be available for Vermont to choose from. We respectfully urge the legislature to consider a more inclusive path, one that is focused on ensuring Vermonters have access to sufficient broadband speeds to meet their needs now and in the future. That will ensure more Vermonters are connected in the short term to proven and reliable providers that are shovel-ready and who provide world-class service.

Our companies are committed to Vermont and are interested in partnering with the state to address the digital divide. With the potential for enhanced federal funding and cooperation between private and public sectors to address that problem, Vermont can emerge from this crisis stronger and better connected for the future.