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Senate Committee on Finance
Vermont State House
115 State Street
Montpelier, VT 05633

Dear Senate Committee on Finance Members,

On behalf of the New England Cable and Telecommunications Association (NECTA), I appreciate the opportunity to provide testimony regarding H.360, An act related to accelerated community broadband development. NECTA is a five-state regional trade association representing substantially all private telecommunications companies in Vermont, Connecticut, Massachusetts, New Hampshire and Rhode Island. In Vermont our member companies include Comcast and Charter Communications. The networks built and maintained by our companies are future-proof and deliver gigabit speeds to more Vermonters than any other provider. As we have for years, our members stand ready to partner with the state of Vermont to bring high speed broadband to unserved residents.

NECTA 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. Today, we provide high-speed broadband to 155,000 homes and businesses through approximately 9,000 miles of fiber.

Overview of NECTA Member Companies' Commitment to Vermont

In today's digital economy, particularly in the wake of COVID-19, we know high-speed internet is critical to our daily lives. That is why private broadband providers in Vermont are investing tens of millions of dollars each year to ensure that networks remain resilient and help as many people as possible—no matter their circumstances, get and stay connected. During the pandemic, private providers have pledged not to terminate service for customers unable to pay their bills, waived late fees, opened up thousands of free Wi-Fi hotspots throughout the state, and donated hundreds of laptops to low-income students in Vermont. In addition to these efforts, this testimony highlights specific programs deployed by NECTA member companies that are connecting thousands of Vermont residents facing financial insecurity.

NECTA member companies are also spending millions of dollars across the state to maintain and upgrade their existing infrastructure to ensure that networks remain resilient, secure from cyber threats and outpace consumer demands for emerging technology trends. In 2019 alone, private cable providers invested \$18 billion on their infrastructure and networks across the United States. And these investments have paid off, as networks remain resilient throughout the COVID-19 pandemic. The Internet & Television Association's (NCTA) [Internet Dashboard](#) shows broadband networks continuing to meet significant increase in usage demand as Americans learn, work and play from

home. Further, NECTA member companies are actively pursuing 10G, or 10 gigabit, capable networks or speeds that are ten times today's maximum speeds. Given the reality of current, ubiquitous 1 gigabit capable speeds and near term 10 gigabit capacity, NECTA members are ensuring that Vermont consumers have the broadband infrastructure to meet the technology needs of the future.

NECTA's Commitment to Digital Equity through Low-Cost Broadband Plans & Adoption Programs

Even if a community has broadband, NECTA members understand that for many people, additional support is needed to get them connected. Before, during and after the pandemic, our members play a critical role in connecting Vermont residents who face financial, cultural, digital literacy or other complex insecurities or barriers that would otherwise prohibit them from subscribing to the high-speed broadband that runs right down the street on which they live. An important connectivity challenge in Vermont, in addition to deploying broadband to the remaining unserved areas, is removing these remaining barriers that prevent residents who have access to the internet but have chosen to not "adopt" or subscribe to that service. It is incumbent on the public and private sectors to support Vermont individuals, families and students by providing solutions to these barriers so they can fully participate in online learning and an evolving 21st century economy.

NECTA member companies are committed to continuing these digital equity efforts and getting more people connected through their low-cost broadband programs. These programs, highlighted below, demonstrate NECTA members' long-standing commitment to providing reliable, high-speed broadband internet with low-cost and subsidized options to make digital equity a reality. Our members continue to educate consumers about broadband adoption and the variety of low-cost options currently available to them as well as provide computing devices and digital literacy training to maximize broadband connectivity. These programs include:

Comcast Internet Essentials

Since 2011, Comcast's [Internet Essentials program](#) has connected more than 10 million low-income Americans to all the opportunities of a digital world through low-cost, high-speed Internet at home. Comcast partners with local communities to pass on the importance of being connected and provide low-cost Internet service and computers along with free training to unlock online potential. Earlier this year, Comcast announced that starting on March 1, 2021, the company would be doubling download speeds to 50mbps and increasing the upload speeds to 5mbps. Previously, Internet Essentials offered 25/3 Internet plans. This is the sixth time in 10 years that Comcast has increased broadband speeds while keeping the cost the same as when it rolled out in 2011. Internet Essentials participants will continue to receive Comcast's most advanced Wi-Fi and security products.

Since the outset of the pandemic, Comcast has provided 60 days of free access for thousands of low-income families through Internet Essentials. As the nation's largest broadband adoption program for low-income Americans, it is available to qualified low-income households in Comcast's service area, with in-home WiFi, and no contracts or credit checks required. Eligible families who qualify for public assistance programs such as the National School Lunch Program (NSLP), Housing Assistance, Medicaid, SNAP, SSI, and other programs qualify for Internet Essentials. With the low-cost service, Comcast also provides the option to Internet Essentials customers to purchase a low-cost laptop or desktop computer and offers free digital literacy training in various languages for customers who need additional assistance. Importantly, on the 10th anniversary of Internet Essentials last month, Comcast

announced it would invest \$1 billion over the next 10 years to help further close the digital divide and give even more low-income Americans the tools and resources they need to succeed in an increasingly digital world. It is estimated that these new commitments will impact as many as 50 million Americans over the next 10 years.

Comcast's Internet Essentials Partnership Program

The [Internet Essentials Partnership Program](#) (IEPP) is designed to help accelerate Internet adoption at a critical time. The program provides the opportunity for school districts and other organizations to contract directly with Comcast to quickly provide high-speed Internet service to large numbers of students and families, at no cost to the individual consumers. Since the onset of the COVID-19 pandemic, IEPP has already collaborated with hundreds of schools, school districts, and other organizations across the state. The program, which relies on public-private partnerships, enables entire communities to work together to coordinate funding to help connect K-12 students.

Through IEPP, sponsored families have access to all benefits Internet Essentials has to offer—a high-speed Internet connection at home, the option to purchase a low-cost computer, and access to free digital skills training in person (if safe), online, and in print. IEPP not only enables more families to connect to the Internet at home, it also allows community-based partners to bring their expertise to empower families to take on the challenges of today while preparing for the future. In Massachusetts, IEPP was added to the Commonwealth's statewide vendor list making it even easier for interested communities to participate.

Comcast's Lift Zones

Established in 2020, Lift Zone from Comcast is a partnership with local community centers and nonprofits nationwide to provide no charge, enterprise-grade, high-capacity Wi-Fi coverage inside safe spaces. "[Lift Zones](#)" are designed to help those students who either do not have Internet service at home, or who do not have a safe or secure environment at home, to get online for distance learning, homework, or other educational activities.

The global pandemic has put many low-income students at risk of being left behind and has accelerated the need for comprehensive digital equity and Internet adoption programs to support them. Lift Zones are intended to help those students who, for a variety of reasons, may be unable to connect to distance learning at home, or who just want another place in which to study. Comcast plans to launch more than 1,000 Lift Zones. Comcast has already established more than 60 of these Lift Zones in the Commonwealth and recently announced that it would complete all Lift Zones by the end of 2021.

Spectrum Internet Assist

Established in 2016, [Spectrum Internet Assist](#) is Charter Communications' low-cost broadband program available to eligible low-income households and seniors. Spectrum Internet Assist provides high-speed internet, a free internet modem, no data caps or contracts, and potential in-home Wi-Fi service. This low-cost program is available to households in which one or more members are a recipient of assistance through the National School Lunch Program (NSLP), the Community Eligibility Provision (CEP) of the NSLP, or Supplemental Security Income for people ages 65 and up.

Charter Communications' Stay Connected K-12

Last October, Charter announced [Stay Connected K-12](#), a new Spectrum Enterprise solution that enables schools to offer high-speed, cable broadband Internet access direct to their students, educators, and staff in their own homes so learning and teaching are uninterrupted. Participants are not billed for their services.

Stay Connected K-12 combines the robust speeds and rich features of Spectrum's broadband Internet with simplified program management and billing for local school districts through Spectrum Enterprise and is a turnkey solution for their students and educators. Users can enjoy:

- In home Wi-Fi to connect each Wi-Fi enabled device in the residence.
- Unlimited usage with no data caps, providing schools/districts with a consistent cost per user.
- 24/7/365 technical support, relieving schools/districts of the responsibility of technical support for the end-user connections.
- Self-installation kit with modem and router that allows end-users to get connected quickly and easily, with no intervention required from schools/districts.

Stay Connected K-12 also maximizes flexibility for districts, allowing them to add students to the program when needed, with no minimum term commitment on any of the connections. Charter representatives have been reaching out to school districts across Massachusetts in Charter Service areas to inform them of this program.

Charter Community Solutions Bulk Program

With more people working/schooling from home, broadband adoption has become more important than ever. The Community Solutions Bulk Program plays a crucial role in closing the "digital divide" with more affordable broadband access. The program provides high speed Internet service (up to 200 Mbps) in bulk at a reduced cost. It offers residents a significant savings off regular retail pricing which includes a modem, wireless router and one aggregated monthly bill to the municipality or entity. Residents also have ability to upgrade or order additional services outside of the bulk package and would be billed directly for those services.

National Cable Partnership with Leading Education Non-Profit to Expand Connectivity Solutions

In addition to the above individual programs that NECTA members are offering in their service areas to get Massachusetts residents connected, last September they signed onto the national "[K-12 Bridge to Broadband](#)" initiative to help identify families that need an internet connection by working with school districts. Through this national initiative spearheaded by the National Internet and Television Association (NCTA) and EducationSuperHighway (ESH), a national non-profit leading the work to close the classroom connectivity gap, K-12 Bridge to Broadband Program has established a national framework of principles that enables cable broadband providers to work directly with school districts to 1) confidentially share information to quickly identify students without broadband at home, and 2) enable school districts to purchase internet service for families facing economic insecurity through sponsored service agreements.

American Rescue Plan Act (ARPA) Dollars for Broadband Deployment – Recommendations

As the Senate Finance Committee considers how to use ARPA funding to expand connectivity in Vermont, NECTA strongly urges that prioritization should be given to proven and successful broadband expansion programs that will extend broadband into Vermont homes as quickly as possible and ensure that solutions for broadband adoption and digital equity remain a part of the ongoing conversation, including support for low-cost broadband plans and for devices, training, and digital literacy like mentioned above. It is also imperative that critical safeguards are applied to the use of any public dollars for broadband deployment to avoid classic traps that have undermined broadband expansion across the country. Such guardrails can make the difference between a golden age of broadband, or a costly sinkhole that squanders millions of public dollars. NECTA provides the following recommendations:

Prohibit Overbuilding

There is an enormous difference between having no broadband and having some broadband. If a community has robust broadband service from a private provider, the State of Vermont should not use scarce federal resources to subsidize competitors while there are communities that have no broadband. Unfortunately, H.360, which recently passed the Vermont House, fails at every level to prevent such overbuilding of private networks. Absent such guardrails, ARPA dollars could find their way to areas of Vermont that already have federally defined broadband, leaving the areas of the state that most desperately need service unserved. Unserved areas are typically uneconomical to build out broadband infrastructure to without public subsidies and any framework for broadband deployment should prioritize the flow of resources to those addresses and areas that are geographically difficult to serve.

Technology Neutral Approach

Everyone can agree that government should not use public dollars to support the buildout of networks that may become quickly obsolete, but this is where the perfect can easily become the enemy of the good. The future is hard to predict in technology, but we know that all networks at a given speed and capability will eventually need to be upgraded. In the cable industry, we rebuild our networks roughly every 19 months and broadband speeds have increased exponentially over the past decade. For example, Comcast and Charter currently offer Gigabit speeds over their entire networks in Vermont, representing the largest providers of Gigabit broadband in the state. Even with these high speeds, our industry is in the process of testing 10 gigabit broadband speeds which will be rolled out over existing networks in the near future – technology that will revolutionize the way consumers manage their digital lives.

Requiring fiber to the premises, or arbitrarily defining broadband as 100/100 symmetrical destroys the notion of being technology neutral and puts government in the position of choosing winners and losers. It is critical that network engineers, rather than politicians, determine the appropriate network design. Certain solutions might work well for one community, but not for another. Technological neutrality is about letting every type of industry compete for public dollars, so long as their networks can be upgraded to meet the demand for speed.

Furthermore, the focus on 100/100 ignores the reality of how customers use broadband, and the bandwidth needs of real-world applications. For example, video streaming makes up most broadband consumption – about 60 percent of all internet traffic – and is primarily a downstream (not upstream) experience. Even two-way video conference applications are efficient and do not need symmetrical

speeds. According to its own website, Zoom only requires 1 Mbps for a high-quality video call for both upstream and downstream. Based on real-world uses, consumers would be substantially better served by a very high downstream speed, coupled with more modest upload speeds.

Support Line Extension Customer Assistance Program

The Line Extension Customer Assistance Program (“LECAP”) was originally funded in Act 137 of 2020 and helped get Vermonters connected in the short-term. Line extensions are an easy and cost-efficient way to extend broadband to hundreds of Vermont homes quickly, as proven by the number of homes that were served through the last round of funding. In fact, there were more applicants for the LECAP than there was time and funding available, so recapitalizing this program would provide a fast connectivity solution for the hundreds of Vermonters that were left out in the first round. Both Comcast and Charter actively participated in this line extension program and are ready and able to connect many more addresses in the near future if the program is replenished. H.315 reauthorizes some CRF funds for LECAP but H.360 does not, so we urge you to prioritize funding for this successful program and include it in any broadband proposal approved on by the committee.

Support Broadband Adoption Programs

Finally, while the low-cost programs highlighted above are helping connect Vermont residents, policymakers should consider additional partnership opportunities to promote adoption efforts and expand digital equity. Broadband legislation moving forward should include funding to help subsidize adoption of low-cost broadband service and related equipment, in-home devices such as laptops, and digital literacy programs. The fastest and most effective way to get families to utilize broadband in areas that already have service providers is by focusing on broadband adoption and investing in people who have yet to sign up for service currently running outside their front door.

Conclusion

NECTA is urging policymakers in Vermont to ensure that any broadband policy include these core tenets: promoting different technologies delivering broadband internet on a neutral basis, promoting successful and proven programs like LECAP to get as many Vermonters connected in the short-term, a prohibition on public dollars going to overbuild in areas where there is already high-speed broadband, and promoting broadband adoption and low-cost programs to help those who have access to broadband but may face financial or other barriers that prevent them from signing up. Getting broadband infrastructure to unserved areas in Vermont and across the country has been a tough battle, but with the recent infusion of federal dollars, the Green Mountain State has an opportunity to turbocharge the buildout. Vermont should make wise policy choices that will advance the goal rather than complicate it.

As always, NECTA and our member companies stand ready to partner with Vermont in these efforts.

Respectfully,

Timothy O. Wilkerson
President