I strongly encourage the Commission to redefine the term Broadband.

It would seem that the key here is the directive of Congress to have "Advanced" capability. In this case one would assume that the goal is to keep the U.S. more than just competitive on the world stage. It is a world economy these days and we are competing with other countries. Therefore the word "advanced" should mean that the U.S. has better capability than most countries, at the same or lower costs.

Unfortunately from various recent studies, the US is nowhere near the world leaders in Broadband speeds. The world has passed us by in spite of the invention of the internet here. Costs are also high compared to other countries. I urge the commission to take various actions to get the US among the leaders again. Otherwise we will fall farther and farther behind. Our current capabilities can hardly be described as "advanced".

A recent paper by the Technical University of Eindhoven and Dialogic looking at requirements for Europe indicates average 2013 download speeds of 15Mbps and projects the average required in 2020 to be 165 Mbps. ("In 2020, sufficient subscription speeds for the average user are forecast to be approximately 165 Mbit/s (downstream) and 20 Mbit/s (upstream)"). If this paper's projections are anywhere near reality, then defining Broadband as 6 Mbps is absurd. Indeed it should probably be defined as greater than 15 Mbps for 2015.

You can see the paper here.

Specifically I would urge the commission do five things to meet the "advanced" requirement.

1. Redefine "Broadband" to represent speeds that would place the US in the top 10 or higher against the countries with which we most compete. In today's world, 6 Mbps (or even 10 Mbps) is NOT broadband and is not competitive on the world stage. Times have changed and Broadband in 2014 should represent speeds of 15-20 Mbps, if not considerably higher. Some may argue that 6 Mbps is "fast enough"... but then the same argument was made 15 years ago that 256 kbps was "fast enough". But "fast enough" is not the same as "Advanced", and "fast enough" today is not "fast enough" tomorrow. The FCC should be forward looking in its definition, not backward looking.
I would suggest that there may need to be two definitions for broadband... One for wired and one for wireless. In both cases the minimum speed should be tied to a world benchmark that keeps the U.S. "advanced" when compared to a world benchmark.

2. The minimum speed defining broadband should change with time and technology. It should not be static for years on end. The minimum broadband speed should be indexed to some world index to allow it to increase over time to ensure the US is competitive and "advanced". These indexes should apply to both Download and Upload measures. Changing every year may be too often. A schedule could be set to change it every two or three years on some date based upon the world index.

3. ISP's that cannot meet the definition of broadband should not be allowed to advertise that they provide broadband connections. The term "high speed Internet" is often used as a synonym for broadband, so that term should also be included. Too many companies will do just the minimum to be able to advertise "high speed internet" or "broadband" or "high speed broadband". The bar is just too low today and you should raise it and keep raising it in the future. This should increase competition among providers.

4. Set standards for allowed marketing language... no "up to" language without a "minimum of" .. Advertised speeds should be guaranteed speeds. It is reasonable to have some wiggle room. For example "minimum of " could mean a minimum speed that is guaranteed to be available 95% of the time to 95% of all customers. Without this, taking it to the absurd, what is to stop a company from advertising "up to" 100 Mbps for its average 6 Mbps service?

Changing the "up to" to "minimum of" protects consumers from misleading advertising. The commission should implement measures to monitor compliance with advertised speeds.

5. A cost measure should also be added to keep the U.S. "advanced" in cost/Mbps, or some other reasonable way to measure the cost of U.S. performance versus the world.

Implementing the above will spur competition and protect consumers. For ISP's that have true world class broadband, they will have a competitive advantage... Those that don't will need to step up their game. Changing the "up to" to "minimum of" protects consumers from misleading advertising.

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