



October 11, 2016

Transmitted via email NBRArfc2016@ntia.doc.gov

National Telecommunications and Information Administration
U. S. Department of Commerce
1401 Constitution Avenue, Room 4887
Washington, DC 20230

Re: National Broadband Research Agenda

Dear Sir or Madam:

The Fiber to the Home Council (“Council”) is a not-for-profit association dedicated to educating the public and communities about the benefits of having access to all-fiber networks, connecting homes, businesses, and institutions, as well as wireless transceivers — and accelerating the deployment of this critical infrastructure. The Council submitted comments last year to the Broadband Opportunities Council (“BOC”) detailing actions the federal government should take to facilitate the deployment of all-fiber networks, including creating and maintaining an inventory of assets (e.g. conduit and poles) that are critical for deploying this essential infrastructure. The Council continues to believe such measures would provide a major return on investment of federal government time and resources. In response to the National Telecommunications and Information Administration’s (“NTIA”) September 9, 2016 notice requesting comment on potential federal broadband research activities (National Broadband Research Agenda), the Council seeks to build on its recommendations to the BOC by proposing that NTIA and the National Science Foundation (“NSF”) develop a “Community Fiber Density Index,” which would serve as a basic research tool.

Because of the need to transmit vast and ever increasing amounts of information and the deterioration of legacy transmission media, all communications networks in the United States are undergoing a fundamental transformation — from copper and coaxial cable to fiber, which holds out the promise of virtually frictionless communication. All-fiber networks not only enable all Americans to participate fully in economic, social, and political activities; for communities, they drive economic growth, and for wireless networks, they provide important connectivity. Because all-fiber networks are such a key input into so much individual, community, commercial, and institutional activity, the Council believes the federal government should track all-fiber connectivity to connection points in a community — e.g. residential, commercial, institutional, and wireless transceivers (the numerator) — in relation to the total number of connection points in a community (the denominator). In effect, this density ratio – the CFDI – would indicate a community’s access to critical all-fiber infrastructure, and then researchers could use this information to analyze and determine (and compare) its value in relation to important outcomes, e.g. economic growth, jobs, investment and educational levels.

The creation of a CFDI builds on work the Council has already undertaken to show how all-fiber networks drive overall economic growth and increase the value of residential single-family and multi-family housing units. The Council has spoken to many communities about the value of this research for educating their citizens about the importance of all-fiber infrastructure and for driving investment in these networks. The proposed CFDI would take the Council's work to an entirely new and beneficial level. The Council and its members stand ready to work with NTIA and NSF to develop and implement this concept.

Please contact me if you have any questions.

A handwritten signature in cursive script, appearing to read "Heather Burnett Gold".

Heather Burnett Gold
President and CEO
Fiber to the Home Council