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Here are the SHLB Coalition comments. We appreciate the opportunity to submit these to the Broadband Opportunity Council.

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June 10, 2015

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Attn: Broadband Opportunity Council

**Comments of the
Schools, Health & Libraries Broadband Coalition
(SHLB Coalition)
to the Broadband Opportunity Council**

(sent by e-mail to BOCrfc2015@ntia.doc.gov.)

The Schools, Health & Libraries Broadband Coalition (SHLB Coalition) is pleased to provide the following comments to the Broadband Opportunity Council (BOC) in response the Notice and Request for comments issued on April 29, 2015.¹ The SHLB Coalition is a broad-based coalition of commercial and non-commercial organizations that work together to promote open, affordable, high-capacity broadband for anchor institutions and their communities. High-capacity broadband is the key infrastructure that libraries, K-12 schools, community colleges, colleges and universities, health clinics, public media and other anchor institutions need for the 21st century. Enhancing the broadband capabilities of these community anchor institutions is especially important to the most vulnerable segments of our population – those in rural areas, low-income consumers, disabled and elderly persons, students, minorities, and many other disadvantaged members of our society. A complete list of our Members is available at www.shlb.org.

¹ Federal Register, Vol. 80, No. 82 Wednesday, April 29, 2015 Notices p. 23785.

² We understand that the BOC is not chartered to review or recommend actions of the Federal Communications Commission (FCC) because it is an independent agency, not part of the Executive Branch. Nonetheless, the FCC

The SHLB Coalition provides several recommendations for Executive Branch action below.² Before addressing the specific questions addressed by the Notice, the SHLB Coalition offers a few opening suggestions:

I. Build a Broadband Policy Around Anchor Institutions.

This is an important time for the Obama Administration to re-dedicate itself to Goal #4 of the National Broadband Plan and to announce that it will build a national broadband policy around community anchor institutions – schools, libraries, health providers, community colleges, community centers, public media, public safety, and others. The President has already taken steps along this path in the ConnectED initiative by declaring that 99% of school children will have high-capacity connections to the Internet by the year 2018. Announcing that the Administration will seek to achieve the National Broadband Plan goal by the year 2020 would be a signature accomplishment of this Administration that would lay the foundation for and catalyze the next round of broadband investment.

Focusing its broadband strategy on community anchor institutions has a number of benefits:

- Community anchor institutions are located in every city, suburb, town and tribal area in America. Centering a broadband strategy around anchor institutions will demonstrate that this administration cares about *all* Americans.
- Anchor institutions are beloved by their community. There is tremendous support across the political spectrum for the work done by community anchor institutions. They are trusted, non-partisan institutions that provide enormously valuable services to young and old, entrepreneurs and unemployed, students and teachers, doctors and patients, etc.
- Providing affordable high-capacity broadband to all anchor institutions is achievable. While the BTOP program connected about 10% of all anchor institutions, and the recent E-rate reforms will connect more schools and libraries, there is much more work to be done. Anchor institutions' needs for broadband will continue to grow as the market develops, as multi-media and video traffic demonstrates. This

² We understand that the BOC is not chartered to review or recommend actions of the Federal Communications Commission (FCC) because it is an independent agency, not part of the Executive Branch. Nonetheless, the FCC plays an important role in fostering broadband deployment and adoption, and the Executive Branch can and often does express its views to the FCC. Our recommendations may also include some consideration of issues before the FCC so that the BOC can consider recommending policy positions that the Executive Branch may bring to the FCC. Also, the SHLB Coalition is not permitted by its grant agreements to discuss future or pending legislation, so these comments will not include any recommendations regarding specific Congressional legislation.

Administration has already made substantial progress toward this goal, but there is much more work to ensure that every anchor institution has the needed broadband capacity, especially those in rural areas.

- Broadband networks built to serve anchor institutions can be leveraged (extended) to serve the surrounding community. Residential broadband adoption rates are higher when the neighborhood school and library has high-capacity broadband. The anchor institutions are a gateway toward the rest of the community. Building “middle-mile” networks to serve anchor institutions that are open to interconnection and sharing can ensure that the benefits of the broadband investment accrue to everyone in the surrounding community.
- Investing in broadband networks to serve anchor institutions is economically efficient and promotes economic growth. A national policy favoring open, affordable, high-capacity broadband to anchor institutions creates jobs, stimulates purchase of high-tech equipment and services, and creates a platform for economic growth for decades into the future.

One of the most important steps that the Obama Administration can take on over the next few months is to identify and assist the non-profit institutions in each state that are best equipped to help anchor institutions collaborate and consolidate their purchase of broadband networks and services at the local level. The National Broadband Plan strongly recommended the creation of a U.S. Unified Community Anchor Network (USUCAN) to accomplish this work. Internet2 has successfully implemented a U.S. UCAN national backbone network that provides long-haul connections for anchor institutions around the country. Community anchor institutions are able to access this national backbone through connections to regional research and education networks. While these research and education networks have made great strides in providing high-capacity broadband connectivity for these community anchor institutions, there are still many sites, especially in rural areas, that do not have affordable last-mile broadband connectivity options. We believe state and local coordination and investment that leverages cost-effective middle-mile infrastructure will ensure that anchor institutions obtain the high-capacity broadband connections they need at the building premises. State and local coordinators could help anchor institutions issue RFPs, negotiate with industry providers to secure “future-proof” connectivity, and provide hands-on experience and capacity in the building and running of networks. By aggregating their purchase at the local level, these coordinators could negotiate bulk equipment service agreements and provide a platform for interconnected networks to share resources and provide training opportunities.

Even though the Obama Administration is nearing the end of its term, the BOC and the President can act now to set up the framework and the institutions that will lay a foundation for

accomplishing these broadband goals over the next five years. It can articulate the principles, set the goals, establish the institutional framework among the government agencies, and create the momentum toward creating a broadband-rich America. For an Administration that has already done so much to advance the state of broadband connectivity, centering a next broadband strategy around anchor institutions would cement Mr. Obama's legacy as "America's Broadband President."

II. All Federal Government Agencies with Authority over Infrastructure Should Pool a Portion of Their Savings from Online Activities to Fund a National Broadband Fund to Promote Deployment and Use of Broadband Networks.

Broadband is a meta-infrastructure that makes all other infrastructures work better - highways, railways, electricity, public safety, public health, national defense, education, public safety agriculture, tax collection and other national infrastructures all operate more efficiently if they are connected to a broadband network. Broadband networks can transmit information instantly and continuously to make more efficient use of all infrastructures. Broadband is critical to connecting and supporting interstate and intrastate and international commerce to ensure our Nation's top position in global competitiveness. We should move away from the idea that "broadband is a commodity" and move towards the view that broadband is a "super-critical infrastructure."

Thus ALL Federal government agencies with infrastructure portfolios have incentives to create a national, interconnected broadband network that is shared and open to multiple uses and users. There is a tendency for federal government agencies to seek to build their own communications networks in silos to address their particular needs, sometimes leading to wasteful and duplicative spending, and in other cases leading to no investment at all. An individual agency may not be able to make an economic case to build a broadband network to a high-cost area, but if the sharing of that network may change the economic analysis and make the business case for deploying in high-cost regions.

Furthermore, federal government agencies are encouraging their constituents/customers/patrons to use on-line services because of the cost savings to the agency. This cost savings depends upon the existence and use of an affordable high-speed Internet connection, but in many areas of the country, affordable, high-capacity bandwidth is simply not available. There is a direct link between the cost savings achieved by an agency and the availability of the network. Thus, government agencies should contribute a share of their cost-savings from online efficiencies by looking at their existing statutory authority to see whether they can reprogram funds to contributing to the construction and use of these high-

speed online networks as well as broadband adoption and use.

For all these reasons, we recommend that *all* federal government agencies should review their statutory authority to see whether they can reprogram funds to promote building broadband infrastructure that is shared with anchor institutions and the community as well as broadband adoption and use. Dept. of Transportation, Dept. of Energy, HHS, Agriculture etc. should contribute to a new federal funds to invest in shared broadband infrastructure.³

III. The BOC Should Review the Recommendations for Federal Government Agencies in the National Broadband Plan to Determine Which Activities Remain to be Completed and Develop a Plan to Do So.

The National Broadband Plan issued in March 17, 2010 is chock-full of important recommendations for the federal government agencies. About ½ of the recommendations concerned government agencies other than the Federal Communications Commission (FCC). The Plan provides detailed recommendations for how broadband can be leveraged to improve healthcare, transportation, energy, education, and many other national priorities. According to the Benton Foundation, 37 of the 219 NBP recommendations specifically address the broadband needs of community anchor institutions.⁴

The SHLB Coalition has not had the opportunity to review and analyze every one of these recommendations to determine what has or has not been accomplished, but a few notable recommendations for anchor institutions are:

- The Department of Education should develop and periodically update standards for locating, sharing and licensing digital educational content, including implementing incentives for promoting adoption and use of open educational resources.
- The Department of Education should encourage improvements to state accreditation policies, and required legal and policy changes, designed to make it easier for students to receive credit for online and blended learning opportunities, support greater professional development opportunities for teachers and school

³ For instance, GSA claims that federal government agencies saved approximately \$332 Million in the first two quarters of 2014 by using the Networx suite of services under an aggregated purchasing contract. See, <http://www.gsa.gov/portal/category/106259>. Pooling just 1/2 of these cost savings per year into a National Broadband Fund would allow the Department of Commerce to expend at least \$332 M annually on broadband to anchor institutions and unserved/underserved communities.

⁴ The Benton Foundation's tracking site for the National Broadband Plan recommendations is located at https://www.benton.org/initiatives/national_broadband_plan.

leaders focused on effective instructional data use (with privacy training) and fully leveraging broadband to improve teaching and learning, and promoting parent and community engagement.

- The Department of Education should incent and support state efforts to adopt digital literacy standards, curricula and educationally appropriate assessments, as core components of their college and career ready standards.
- The National Science Foundation should use its technology transfer grants to spur regional innovation and development as well as greater collaboration across universities.

We respectfully suggest that the BOC should survey the federal government agencies to determine which of these National Broadband Plan recommendations have been completed and which remain to be implemented.

A. Overarching Questions

1. How can the federal government promote best practices in broadband deployment and adoption? What resources are most useful to communities? What actions would be most helpful to communities seeking to improve broadband availability and use?

A: The federal government could gather and publish accounts of communities that have financed and deployed broadband networks that are financially sustainable. For instance, the federal government could develop White Papers that include the network infrastructure diagrams and demonstrate how to make affordable, open, high-capacity connections to CAIs. While some in the industry claim that municipal networks are not viable financially, there appear to be many such community networks that are in fact financially solvent and beneficial to their communities for several years.

2. How can the federal government best promote the coordination and use of federally-funded broadband assets?

A: Broadband networks built with federal government support should be open to interconnection and shared use. These networks should be clearly mapped, and their location of these facilities should be made publicly available to allow other network providers to build off of these facilities, rather than duplicating them.

A good example of leveraging funding for broadband infrastructure is the so-called V6 project (in the President's budget), which would install a high-speed fiber network connecting

all public media stations in a closed internal network, to be used as the primary way to share programming among stations instead of the current satellite network. This interconnection system will also support critical WARN early warning infrastructure for weather and emergency alerts. This is especially critical in rural areas that may lack any other local news source. Leveraging these assets for public safety (NG911, FirstNet, etc.) is yet another opportunity to coordinate among agencies. Projects such as these may serve as anchor projects where other anchor institutions may lack sufficient resources and/or cannot justify the on-going expense.⁵

3. What federal regulations and/or statutes could be modernized or adapted to promote broadband deployment and adoption?

A: The Federal government should establish that broadband is an essential communications service, and all federal government agencies should be charged with the responsibility to incorporate broadband deployment and use into their policies. Furthermore, federal government rules that give a preference to certain industry participants – such as traditional telephone companies – should be amended to open the playing field to non-traditional competitors and non-profit providers. Removing the preferences for certain companies will promote greater investment by new entrants, and will speed the transition toward IP-based services and will incentivize future-proof technology.

Furthermore, as recommended in the National Broadband Plan, the FCC should review its wholesale competition regulations to ensure widespread availability of the inputs necessary to provide broadband services to small businesses, mobile providers and enterprise customers, including anchor institutions.⁶ In particular, the Executive Branch should encourage the FCC to complete its long-standing docket to address the rates, terms and conditions of broadband access circuits, referred to as “special access.” Whether traditional TDM or Ethernet facilities, these critical inputs to broadband service remain overwhelmingly dominated by a few large incumbent carriers who have the incentive to charge rates that are higher than they would be in a competitive market. The FCC must take immediate action to ensure that the rates for these vital facilities are just and reasonable, and that the terms and conditions governing provision of broadband access services do not lock customers into contracts that foreclose even the possibility of competition. Ensuring that broadband access rates, terms and conditions are just and reasonable will reduce the cost of deploying broadband facilities, and should accordingly be a priority for the federal government where competition is limited or non-existent.

⁵ See, <http://current.org/2015/05/public-radio-satellite-system-joins-pbs-in-testing-ip-based-interconnection/>.

⁶ National Broadband Plan, p. 48, Recommendations 4.7 and 4.8.

4. As the federal government transitions to delivering more services online, what should government do to provide information and training to those who have not adopted broadband? What should the federal government do to make reasonable accommodations to those without access to broadband?

A: The federal government should make funding available to promote information and training, but the most effective training is done at the local level, not at the federal level. The most successful training programs are those that involve the local community – the anchor institutions, the civic associations, churches, senior citizen homes and clubs. This includes professional development of teachers and school leaders to improve teaching and learning in the classroom, but also with regard to strategies for family engagement designed to ensure students have access to broadband for homework and other non-school learning opportunities.

5. How can the federal government best collaborate with stakeholders (state, local, and tribal governments, philanthropic entities, industry, trade associations, consumer organizations, etc.) to promote broadband adoption and deployment?

A: The federal government can provide matching funding for state and local broadband planning grants. Such funding can be awarded only to those entities that demonstrate a commitment to involving the entire community in developing a broadband plan that incorporates the needs of all participants, including anchor institutions, other community organizations, the broadband industry, and state and local governments. It is important to ensure that no participant should be allowed to “veto” a broadband plan or stonewall the development of such a plan to protect an existing, low-bandwidth network. Rather all parties should work together to plan for an affordable, high-bandwidth network that serves the entire community. These plans, once developed and published, will themselves facilitate entry by one or more broadband providers who recognize that the community has identified its broadband needs and has laid the groundwork for a successful broadband deployment and adoption strategy.

B. Addressing Regulatory Barriers to Broadband Deployment, Competition, and Adoption

6. What regulatory barriers exist within the agencies of the Executive Branch to the deployment of broadband infrastructure?

A: Access to federal rights-of-way should be streamlined.

Also, removing “resale/revenue” restrictions on federally funded fiber assets would benefit all providers and enhance opportunities for for-profit companies as well as open the door to future private sector investment that will benefit the general public.

7. What federal programs should allow the use of funding for the deployment of broadband infrastructure or promotion of broadband adoption but do not do so now?

A: The FCC initially invited “expressions of interest” from a variety of non-traditional broadband providers to provide next-generation broadband services in rural areas. Over 1,000 expressions of interest were received, including many from Research & Education Networks and municipalities. But the FCC ultimately decided to fund only projects submitted by Eligible Telecommunications Carriers, who are frequently the incumbent local telephone companies in that area. Anchor institutions in rural areas would benefit from greater competitive choices for broadband services. The FCC should open up the Rural Broadband Experiments program to non-traditional providers. If the FCC does not do so, then another government program should be created to give non-traditional broadband providers an opportunity to receive government support and deploy service to anchor institutions in these rural areas. And the government should measure and monitor and publish the success, failures, and strengths and weaknesses of all approaches.

9. Are there specific regulations within the agencies of the Executive Branch that impede or restrict competition for broadband service, where residents have either no option or just one option? If so, what modifications could agencies make to promote competition in the broadband marketplace?

A: Telehealth will be a huge user of bandwidth in the near future, especially for the elderly who want to “age in place”. Telemedicine can be promoted by allowing doctors to be reimbursed for healthcare provided over broadband networks. HHS is an example of one federal government agency that has a direct stake in promoting broadband infrastructure and use. Telemedicine and telehealth services can save consumers and doctors and hospitals a significant amount of money by providing easier access to a medical professional using smartphones, video and other online services.

The BOC should support efforts at the federal level to standardize the process for physician credentialing to provide telehealth services and provide reimbursement for appropriate health care services delivered via telecommunications. These are two key barriers to the expansion of telemedicine programs. Addressing this credentialing issue, and ensuring that doctors receive reimbursement for telehealth-provided services will give the medical industry greater confidence to use broadband services, thus driving up both demand and deployment.

Also, the RUS Distance Learning and Telemedicine Program Grant Application could be amended to fund broadband connections and the funding limit could be raised to \$750,000 per year.

As noted in response to question 3 above, the lack of regulatory controls over broadband access rates, terms and conditions has allowed large incumbent carriers to charge excessive rates and to impose onerous and anti-competitive terms and conditions on their captive customers. The Executive Branch should urge the FCC to remedy this situation immediately.

10. Are there federal policies or regulations within the Executive Branch that create barriers for communities or entities to share federally-funded broadband assets or networks with other non-federally funded networks?

A: Federal policies should allow broadband providers to include excess capacity in their networks and allow the broadband provider to share or sell access to this excess capacity to non-federal government users. For instance, the costs of adding additional fiber strands into a fiber cable (beyond the amount of fiber needed by the federal government agency) are relatively small, and these additional fiber strands should be made available to the community on reasonable terms and conditions.

11. Should the federal government promote the implementation of federally-funded broadband projects to coincide with other federally-funded infrastructure projects? For example, coordinating a broadband construction project funded by USDA with a road excavation funded by DOT?

A: Yes. Such coordination is absolutely essential to achieving a coherent and efficient broadband strategy. The broadband industry – including traditional telephone companies, cable companies, Research and Education networks, and other private sector companies could be encouraged to work together to identify overlap in government programs and help the government agencies identify and facilitate opportunities for coordinated broadband RFPs.

C. Promoting Public and Private Investment in Broadband

12. How can communities/regions incentivize service providers to offer broadband services, either wired or wireless, in rural and remote areas? What can the federal government do to help encourage providers to serve rural areas?

A: The costs of deploying broadband in rural areas can be enormously high, and the potential revenues low. Local, state, and federal government should consider measures to alter the economic equation to encourage the private sector to invest to serve rural and remote areas. For instance, tax credits could be granted to broadband providers to serve rural and remote areas. Federal subsidies should be expanded in particularly high-cost areas. If the private sector is not able to deploy such networks, even with increased incentives, then the federal government should consider working with the state governments to build and deploy these networks themselves. Alternate fiber including wireless fiber solutions are cheaper and

easier to deploy than fiber and easier to scale.

If these incentives do not work, consideration should be given to creating a federally-owned corporation – analogous to the Tennessee Valley Authority – to deploy and own broadband infrastructure in the most remote rural areas. The U.S. may learn from the Ultra-Fast Broadband Initiative created by New Zealand. That country established a national organization – Crowne Fiber Holdings – that administers a national wholesale dark fiber network and encourages private sector companies to lease and provide last-mile retail services directly to schools, hospitals, business and residential consumers.⁷ The BOC should recommend a federal government agency to conduct a study of these federal-chartered options in New Zealand and other countries that could be completed by the spring of 2016.

13. What changes in Executive Branch agency regulations or program requirements could incentivize last mile investments in rural areas and sparsely populated, remote parts of the country?

A: The Comprehensive Community Infrastructure (CCI) component of the BTOP program provided an excellent approach to broadband infrastructure deployment that could be applied to all executive branch broadband procurements. In other words, any procurement for broadband service by the National Forest Service or the Bureau of Indian Affairs or Department of Education should require the broadband facilities to be open to interconnection and designed to facilitate benefits for the entire community, not just the particular government agency. Any new deployments of broadband networks could be made available to the community anchor institutions along the proposed route of the broadband facilities and encourage resale or shared use by other commercial providers who can build off of the federal government facilities and expand their broadband footprint to the surrounding community.

Government-procured broadband networks should not be siloed; they should be shared. The government agency can be an anchor tenant on a community-wide broadband network.

14. What changes in Executive Branch agency regulations or program requirements would improve coordination of federal programs that help communities leverage the economic benefits offered by broadband?

A: The BOC should recommend that federal government agencies coordinate, and aggregate when possible, their purchase of broadband services. Sometimes different branches of the same Executive Branch agency will issue separate RFPs for similar broadband services without any coordination. As described in the National Broadband Plan, aggregating the purchase of broadband services can lead to more efficiencies and lower costs. Privacy and security over shared networks can be addressed with software (firewalls). Creating a

⁷ See, <http://www.med.govt.nz/sectors-industries/technology-communication/communications/broadband-policy/ultra-fast-broadband-initiative>.

Broadband Coordination Office within the Executive Branch would help to call attention to the importance of this important national goal.

15. How can Executive Branch agencies incentivize new entrants into the market by lowering regulatory or policy barriers?

A: The Executive Branch can publicize successful examples and best practices of community broadband deployment strategies. This would allow communities to share information and replicate successful broadband models.

The BTOP program sparked many collaborations and partnerships in states that would have otherwise not occurred. But that program took advantage of “shove-ready” projects to fit within the 3-year time frame needed for the economic recovery. Other areas of the country will require more lead time and planning before they are ready to receive funding and attract investment. The Executive Branch should consider a broadband planning program for communities that are not yet shovel-ready but that have a strong need for broadband investment. This program may require a longer-term time horizon (5-7 years funding) instead of 3 years in the BTOP program for BTOP so that planning and design could happen.

D. Promoting Broadband Adoption

16. What federal programs within the Executive Branch should allow the use of funding for broadband adoption, but do not do so now?

A: FCC officials have said that the upcoming reform of the Lifeline program is not intended to address broadband adoption. In this case, there is an urgent need for some other federal government agency to be responsible for promoting broadband adoption as a national priority.

The BOC should recommend the creation of a National Digital Literacy Corp to promote promote broadband adoptions, as recommended in the National Broadband Plan. NTIA successful created an online Digital Literacy Portal, which provides a great amount of useful information about subscribing to broadband services. NTIA also created a Digital Literacy Toolkit which shares best practices developed from broadband adoption and digital literacy projects funded by the Broadband Technology Opportunities Program (BTOP). Leveraging the experience of about 100 communities served by BTOP to benefit the entire nation, the Toolkit gives practical ideas and tools for overcoming barriers to getting more Americans online access. The next step is to create or foster teams of people in each community that are trained to use the Portal and bring the benefits of this work to the attention of the people who do not currently subscribe.

23. How can the federal government make broadband technologies more available and relevant for vulnerable populations?

A: Federal government agencies should be rewarded based on their results for encouraging vulnerable population groups to use their online services. For instance, employees of Health and Human Service, Department of Education, or the Department of the Interior could be awarded prizes or earn special recognition for establishing programs that are successful in stimulating use of online government services. For instance, HHS employees could be rewarded for convincing elderly people to wear heart monitors, or the VA could be rewarded for increasing the veterans' online benefits, or the Small Business Administration could be rewarded for the number of online companies it helps to foster.

H. Measuring Broadband Availability, Adoption, and Speeds

27. What information about existing broadband services should the Executive Branch collect to inform decisions about broadband investment, deployment, and adoption? How often should this information be updated?

A: We are very concerned that the mapping of broadband for community anchor institutions will not be maintained in the future. The responsibilities for the National Broadband Map are being turned over to the FCC, but the maps may focus on residential consumers but may not gather and publish information about CAIs' broadband connectivity. The FCC has been attempting to gather mapping information about schools' and libraries' connectivity, but this effort does not include other anchor institutions. Mapping the connectivity of anchor institutions will require resources and would require a commitment for a certain consistency of data collection. There should be a consistency in the questions asked by measurement and mapping organizations to ensure that the results are comparable from state to state. In addition, given the importance of broadband to the national economy, broadband measurements should be collected in the decennial U.S. Census.

Thank you for the opportunity to submit these comments. If there are any questions about this filing, please contact me at (202) 256-9616.

Sincerely,



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Appendix A

Excerpt from the Fact Sheet: Next Steps in Delivering Fast, Affordable Broadband

Issued by the White House Press Office

March 23, 2015

<https://www.whitehouse.gov/the-press-office/2015/03/23/fact-sheet-next-steps-delivering-fast-affordable-broadband>.

Standing up the Broadband Opportunity Council. Today the President signed a new Presidential Memorandum making good on his promise in Cedar Falls to stand up a new Council singularly focused on increasing broadband investment and adoption.

- The Council, co-chaired by the Secretaries of Commerce and Agriculture, includes over twenty-five different government agencies and components, all united around clear policy objectives to:
 - Engage with industry and other stakeholders to understand ways the government can better support the needs of communities seeking broadband investment;
 - Identify regulatory barriers unduly impeding broadband deployment or competition;
 - Survey and report back on existing programs that currently support or could be modified to support broadband competition, deployment or adoption; and
 - Take all necessary actions to remove these barriers and re-align existing programs to increase broadband competition, deployment, and adoption.
- The Council will report back to the President, within 150 days, with the steps each agency will take to advance these goals, including specific regulatory actions or budget proposals.

These steps will build on and expand several actions agencies have already taken during this Administration, such as developing a common application form for wireless broadband providers to lease space for their rooftop antennas, sharing of best practices for “dig once” policies by state and municipal governments nationwide, and offering new online tools for finding and leasing federal assets available for broadband networks.