

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of:)	
)	
Development of Nationwide Broadband Data)	WC Docket No. 07-38
to Evaluate Reasonable and Timely)	
Deployment of Advanced Services to All)	
Americans, Improvement of Wireless)	
Broadband Subscribership Data, and)	
Development of Data on Interconnected)	
Voice over Internet Protocol (VoIP))	
Subscribership)	

COMMENTS OF THE IOWA UTILITIES BOARD

The Iowa Utilities Board (Board or IUB) submits these comments in response to the Public Notice inviting comments for the FCC's review of the Development of Nationwide Broadband Data to Evaluate Reasonable and Timely Deployment of Advanced Services to All Americans, the Improvement of Wireless Broadband Subscribership Data, and the Development of Data on Interconnected Voice over Internet Protocol (VoIP) Subscribership.

On April 16, 2007, the FCC released a Notice of Proposed Rulemaking (NPRM) concerning the collection of information needed to develop and maintain appropriate broadband policies. Specifically, the Commission seeks comments on how it can best ensure it receives sufficient information about the availability and deployment of broadband services nationwide; how it can improve the wireless broadband Internet access service data currently collected; whether it should modify the speed tier information currently collected; and, how it can best collect subscribership information on interconnected VoIP service.

Iowa has collected data related to broadband availability and deployment since 2000, when the Iowa General Assembly passed legislation (Senate File 2433) requiring the IUB and the Iowa Department of Economic Development (IDED) to submit a report with recommendations to ensure access to high-speed Internet service in rural Iowa. In response to the legislative mandate, the IUB and IDED surveyed high-speed Internet service providers in Iowa and collected data by community on the availability or deployment of high-speed Internet services. To be consistent with the FCC's definition of broadband, the survey defined "high-speed" as technology capable of providing access services with over 200 kilobits per second (kbps) in at least one direction. Following the collection and analysis of the survey data, the IUB and IDED issued a report "*Assessing High-Speed Internet Access in the State of Iowa*" in October 2000. Since that time, the IUB has conducted four additional surveys (approximately every 18 months) and issued reports tracking the progress of high-speed Internet service deployment in Iowa. The IUB reports on Internet access can be found at: www.state.ia.us/government/com/util/telecom/high_speed_internet.html.

The IUB survey instrument has evolved to a degree since it was created in 2000, but has remained essentially the same over the past five surveys to allow for consistency and comparability. Originally, the survey instrument was designed to have providers report the total number of high-speed Internet subscribers by community. In the IUB's fifth survey, providers were asked to report the number of subscribers by speed tier (200-512 kbps; 513-999 kbps; 1-4.99 mbps; and Over 5 mbps) for each community and zip code that they served.

Broadband pricing information was also added to the IUB's fifth survey to allow the Board to analyze the affordability of broadband services to lowans. However, due to the diversity of the pricing for high-speed Internet services, it was difficult to quantify this data, but the information provides a baseline for future analysis. The Board would recommend that the Commission collect pricing information by adding a new section to the Form 477. The pricing information should include both stand-alone and bundled product offerings. Although it may be challenging to analyze on a national basis, the Commission may find the data helpful when it performs more granular analysis.

Although the Board has gathered broadband information since 2000 and has data on whether broadband services are available to at least one customer in a community, the IUB survey, like Form 477, does not identify what portions of the community or zip code have broadband access. The data also does not show whether customers in the rural areas of a community have the same availability to broadband as the customers living within the city limits.

The Board believes that the data provided on Form 477 is sufficient to gauge general availability and deployment of broadband services and is uncertain if requiring providers to report more detailed data (either 9-digit zip or geocoding) would be cost effective. Additionally, the Board believes that the Commission should focus more analysis on (1) the zip codes where broadband is not currently available to determine if there is sufficient demand in these zip codes to warrant deployment of broadband services, and (2) the zip codes with the lowest "take rates," which may reflect above-market pricing.

The IUB attempts to collect data from wireless and VoIP providers of broadband services, but as of the last survey (January 2006), there has been limited information from these providers, which claim they are exempt from state regulation and therefore refuse to participate in the survey. The Board has no specific comment on how the Commission can better collect information related to wireless or VoIP providers, but would appreciate Commission assistance in encouraging VoIP and wireless participation in state surveys.

As mentioned above, the IUB survey collected speed tier data in its fifth survey. This information provided interesting insight to the speeds use by lowans. “Overall, 65.7 percent of customers subscribed to service with download speeds of 1-4.99 mbps and 27.0 percent subscribed to service with download speeds of 200-512 kbps.”¹ Another 5.2 percent of lowans subscribe to service with download speeds of 513-999 kbps and 2.1 percent subscribe to service with download speeds greater than 5.0 mbps.

The Board recommends that the Commission divide the first Form 477 speed tier (currently 200 kbps-2.5 mbps) into two groups (200 kbps–1 mbps and over 1 mbps to 2.5 mbps). By dividing the tier, the Commission will be able to estimate the demand for the lower speed broadband service. The IUB suggests that the FCC’s definition of “broadband” not be changed until it is determined that providers no longer offer service at the lower speeds or that there is no longer demand for that service.

¹ Iowa Utilities Board, “Assessing High-Speed Internet Access in the State of Iowa, Fifth Report,” May 2006, p. 21.

CONCLUSION

The Iowa Utilities Board respectfully submits these comments for the Federal Communication Commission's review on the collection of information needed to develop and maintain appropriate broadband policies.

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Respectfully submitted,

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