The Honorable Tom Wheeler  
Chairman  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554  

Re:  Connect America Fund, WC Docket No. 10-90

Dear Mr. Chairman:

The Fiber to the Home Council Americas (Council) appreciates your leadership in encouraging the development of future-proof, all-fiber networks (including fiber to the premises (FTTP) networks) throughout the country. Just recently, as part of the Commission’s approval of the AT&T/DirecTV transaction, you announced that AT&T would be deploying FTTP to an additional 12.5 million locations— a build out 10 times the size of its current deployment. And, in congratulating Lafayette Utilities Service on its all-fiber community network, you noted that these networks not only provide super-fast broadband but also bring economic and social benefits to their communities.

Your efforts also have not been limited to seeing all-fiber networks deployed in urban areas. In adopting and implementing the Rural Broadband Experiments program, the Commission demonstrated that with Connect America Fund (CAF) support, consumers in less dense, rural areas too can have access to all-fiber networks. The Commission sought to extend this paradigm in adopting its Connect America Fund order last December by encouraging “parties receiving ten years of support through the Phase II competitive bidding process to deploy future-proof networks that are capable of meeting future demand.”

The Council understands that the Commission’s Wireline Competition Bureau may soon adopt a framework for the CAF Phase II competitive bidding process. We urge it to seize this opportunity and build on last December’s Connect America Fund order to make the deployment of all-fiber networks a fundamental element in this framework. By doing so, it will ensure that rural consumers and their communities have the basic infrastructure so critical to their futures.

To that end, in establishing a framework for the Phase II competitive bidding process, the Council recommends the Commission follow an approach similar to the one established in the Rural Broadband Experiments program and first hold a “fiber-only” reverse auction, permitting all qualified providers to participate and selecting winning bidders based on a cost-effectiveness standard.
Again, thank you for your leadership in propelling the deployment of all-fiber networks to all Americans. Your efforts will enable high-performance broadband service driving economic growth, social involvement, and political engagement.

Sincerely,

Heather Burnett Gold
President and CEO
Fiber to the Home Council
Americas

cc: Gigi Sohn
    Daniel Alvarez
    Matthew Delnero
    Carol Mattey
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