



September 13, 2019

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

**Re: Notice of *Ex Parte* Submission of the Fiber Broadband Association, GN
Docket No. 18-122**

Dear Ms. Dortch:

On July 26, 2019, the Fiber Broadband Association wrote the Federal Communications Commission to support proposals that factor into any reallocation of C-Band spectrum for next-generation wireless services the opportunity for all multichannel video programming distributors (“MVPDs”) to have access to future-proof fiber networks to access video programming. To address the issue of whether it is feasible within an approximately five year period to deploy such a nationwide network, we gathered information from our association members that have decades of experience in supplying fiber and related components and constructing networks for themselves or others.

Over the past five years, the North American fiber cable market¹ has grown at an annual compound annual growth rate (“CAGR”) of approximately 12%. For 2019, we forecast that over 575,000 route kilometers (kms) of fiber cable will be supplied in this market.² The 5G Plus solution has estimated that a total of 120,000 route miles (192,000 route kms) of fiber will need to be deployed to create the proposed nationwide video programming network.³ Assuming a 144-strand average fiber cable count, such an additional build over a five-year period would

¹ The United States composes more than 90% of this market.

² Assumes 144-strand average fiber count. The actual count may be lower or higher depending upon the provider, the provider’s network, and the provider’s customer base.

³ See e.g., “C-band Spectrum Clearing Plan,” Cartesian, at 8 (July 11, 2019) filed with Letter from Ross Lieberman, ACA Connects, Alexi Maltas, Competitive Carriers Association, and Elizabeth Andrion to Marlene H. Dortch, Secretary, Federal Communications Commission, GN Docket No. 18-122 (July 15, 2019).

Marlene H. Dortch, Secretary
Federal Communications Commission
September 16, 2019
Page 2

increase deployments by 7% per year over the 2019 forecast level. Given that the current CAGR is 12%, we believe the additional deployment over that time frame is feasible,⁴ assuming there are no other issues, including in accessing rights-of-way, poles, and other infrastructure.

This letter is being filed electronically pursuant to Section 1.1206 of the Commission's rules.⁵



Lisa R. Youngers
President and CEO
Fiber Broadband Association
Suite 800
2025 M Street NW
Washington, DC 20036
Telephone: (202) 367-1236

⁴ FBA notes that there should be no constraints in accessing fiber cable during this period. For the worldwide fiber cable market, supply is forecast to exceed demand as follows: 2019 – 190 million fiber kms; 2020 – 202 million fiber kms; 2021 – 160 million fiber kms; 2022 – 127 million fiber kms; 2023 – 75 million fiber kms. The worldwide gap is due to Chinese manufacturers producing supply far in excess domestic demand as follows: 2019 – 211 million fiber kms; 2020 – 214 million fiber kms; 2021 – 208 million fiber kms; 2022 – 209 million fiber kms; 2023 – 208 million fiber kms. Chinese manufacturers export this excess supply to non-domestic markets.

⁵ 47 C.F.R. § 1.1206.