



December 5, 2019

The Honorable Ajit Pai
Chairman
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Dear Chairman Pai:

The Fiber Broadband Association (FBA) commends you on announcing a new universal service fund to bring 5G mobile wireless connectivity to hard-to-serve areas. We agree with you that rural Americans should enjoy the benefits of 5G technology just as urban residents will and that “the Universal Service Fund must be forward-looking and support the networks of tomorrow.”¹ Not only will this fund ensure that 5G mobile service reaches across the country, but because fiber connectivity is essential for 5G, it will accelerate the deployment of fiber to rural areas, enhancing high-performance broadband connectivity for other purposes, including Internet access, IoT services, and smart community applications. Additionally, once mobile 5G service is deployed, residents in these areas will almost certainly have access to fixed 5G service, which already is being offered at 300+ Mbps speeds.²

Your announcement of the new 5G Fund highlights the need to ensure that in adopting rules for the Rural Digital Opportunity Fund (RDOF),³ the Commission also takes a forward-looking view and supports networks that will be fundamental communications infrastructure for our future. As you and others have explained, two network technologies will drive our 21st Century communications infrastructure: fiber and 5G.⁴ And in numerous respects, fiber is the

¹ See, “Chairman Pai Announces Plan to Launch \$9 Billion 5G Fund for Rural America,” FCC News (Dec. 4, 2019) available at <https://docs.fcc.gov/public/attachments/DOC-361168A1.pdf>.

² See e.g., “Verizon CEO Says Fixed 5G Will Grow in 2020,” Light Reading 5G (Oct. 25, 2019) available at <https://www.lightreading.com/mobile/5g/verizon-ceo-says-fixed-5g-will-grow-in-2020/d-d-id/755159>.

³ *Rural Digital Opportunity Fund*, WC Docket No. 19-126, Connect America Fund, WC Docket No. 10-90, Notice of Proposed Rulemaking (rel. Aug. 2, 2019) (“RDOF NPRM”).

⁴ See e.g., “Remarks of FCC Chairman Ajit Pai at the Council of Foreign Relations,” (Nov. 5, 2019) available at <https://docs.fcc.gov/public/attachments/DOC-360632A1.pdf>; “Pai: 5G Future is a Wired One with Promise for Rural America,” telecompetitor (Feb. 5, 2019) available at <https://www.telecompetitor.com/pai-5g-future-is-a-wired-one-with-promise-for-rural-america/> (last visited

more fundamental, connecting 5G sites, residences, businesses, institutions, IoT devices, smart city infrastructure, and much more.⁵ Yet, the RDOF potentially may result in the deployment of networks providing lower-performance fixed broadband service to unserved, eligible areas for the next decade.⁶ That would be a wasted opportunity. Further, it would be wasteful for the government to use the RDOF to invest in lower-performance networks when, with private or government-supported 5G deployments, many, if not most, of these same areas will get within a matter of years much higher-performance fixed 5G service, although not as high-performance as direct fiber connectivity.

As you have noted in your many speeches and statements, the Commission is fully committed to bridging the digital divide,⁷ and with the 5G Fund, you are taking a major step in that direction. The RDOF, if properly implemented, also would make an enormous contribution toward bringing high-performance broadband to all Americans. FBA urges the Commission to seize the opportunity with the RDOF and ensure it supports tomorrow's infrastructure.⁸



President and CEO
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on Dec. 5, 2019); “5G wireless needs fiber, and lots of it,” Brian Lavalee, Ciena available at https://www.ciena.com/insights/articles/5G-wireless-needs-fiber-and-lots-of-it_prx.html (last visited on Dec. 5, 2019).

⁵ See e.g., “Why Fixed 5G Will Never Completely Replace Wired Internet,” gvec.net (June 10, 2019) available at <https://www.gvec.net/fixed-5g-will-never-completely-replace-wired-internet/> (last visited on Dec. 5, 2019); “The Case for Fiber to the Home, Today: Why Fiber is a Superior Medium for 21st Century Broadband,” EFF (Oct. 16, 2019) available at <https://www.eff.org/wp/case-fiber-home-today-why-fiber-superior-medium-21st-century-broadband> (last visited on Dec. 5, 2019).

⁶ RDOF NPRM, para. 23.

⁷ See e.g., “Remarks of FCC Chairman Ajit Pai at the University of Mississippi Tech Summit,” (Aug. 28, 2019) available at <https://docs.fcc.gov/public/attachments/DOC-359335A1.pdf>.

⁸ As it considers adopting rules for the RDOF, FBA encourages the Commission to review the December 3, 2019 report by Broadband Now, “China’s Fiber Broadband Internet Approaches Nationwide Coverage; United States Lags Severely Behind,” available at <https://broadbandnow.com/report/chinas-fiber-broadband-approaches-nationwide-coverage> (“Who is winning in the information age? The question has been asked from many different perspectives, but one undeniable truth is that in the near future, economic development will be increasingly predicated on national access to robust, future-proofed internet infrastructure. Many developed and developing countries seem to be fully aware of this, but perhaps none have the same level of ambition that has fueled China’s aggressive rollout strategy over the past seven years. In 2013, 17 percent of consumers in both China and the U.S. had access to a fiber internet connection. Fast forward to 2019, China’s penetration has jumped to 86 percent while the U.S. is only at 25 percent. While America continues to suffer from an immense digital divide, China’s government has made incredible progress building out a state-sponsored super network of fiber optic connections. This infrastructure will allow the country to take early advantage of some of the most impactful applications resulting from the fourth industrial revolution.”).