

VIAERO WIRELESS POSITION SUMMARY

**Tough Choices**

1. **Make meaningful investments in broadband or support legacy networks. You can't do both.**
  - a. Wireline broadband solutions throughout all high cost areas are cost-prohibitive
  - b. The commission should consider “bang for the buck”
  
2. **Lower the bar for “Success” or Demand Efficiency**
  - a. Are the goals of USF reform meaningful?
    - i. Is the goal to provide meaningful (4Mbps down/1Mbps up) broadband speeds to all, or nearly all, Americans?
    - ii. In 2011, 768 Kbps is not good enough, and five years from now it will be “narrowband.”
  - b. Meeting meaningful broadband deployment goals requires efficient technology
    - i. Mobile broadband solutions are 10% of the cost of fiber
    - ii. Supported by growing voice and data businesses, not shrinking POTS networks dependent on federal subsidies

**Efficiency Factor:  $\$/HH \times Mbps \text{ (down+up)} \times HH/mi^2$**

3. **Competition, Heavy Regulation, or Look the Other Way?**
  - a. If a single winner is chosen in reverse auctions, who enforces service and build requirements – who becomes the Broadband Police?
    - i. The FCC does not have the capability to undertake a national back-end enforcement effort. Do states commissions?
    - ii. Coverage verification, speed verification, drive testing, price monitoring, consumer protection, interconnection requirements, resale requirements, terms of required co-location, would all have to be dealt with.
  - b. Consumers can solve these problems if they have a choice
    - i. Market-based pricing, customer service, and speed
    - ii. Coverage verification/cream skimming require oversight, just as they do today

**Policy Horizon**

1. **Mobile Broadband Development.** Speeds exceeding 20 Mbps in 2011, scalable to 100 Mbps within a few years with comparatively small capital investment (primarily software upgrades). The wrong auction criteria could mean the wrong results.
2. **“Reasonably Comparable”.** Means access to broadband at meaningful speeds (no less than 4 Mbps), as well as access to mobile broadband networks preferred by urban consumers. Mobile internet users are projected to overtake fixed users by 2014.