



New England Cable & Telecommunications Association, Inc.

Chairman Tong, Chairman McGee and members of the Commission on Economic Competitiveness,

The signatories on this testimony represent the major telecommunications providers in Connecticut. We compete robustly against each other on a daily basis, but we are jointly writing you today out of a grave concern we have about the report submitted to the Commission from the Business Council of Fairfield County Foundation (BCFCF).

The report, entitled *Connecticut Economic Competitiveness Diagnostic, Background Analysis* (BCFCF Report), contained erroneous information concerning the quality and availability of broadband access networks and services in this state. This erroneous information is in slides 51 and 52 of the BCFCF Report, which was originally published on the state's website.

The information in slides 51 and 52 of the BCFCF Report concerning broadband access seems to be a continuation of a recent trend of misinformation about the availability and quality of broadband access in Connecticut that rely wholly on anecdotal rather than scientific information.

As we have seen in other reports, this report seems to be agenda driven and cherry picks "data" that does not paint an accurate picture of the true availability and quality of broadband access in the state. In fact, in this instance, the report is wholly inconsistent with data and findings from the Federal Communications Commission (FCC), which are based on scientific methodologies and show that Connecticut has some of the fastest broadband speeds in the United States. We are mystified as to why the authors of the report would use faulty data to underplay our state's achievements and thereby hobble our state's ability to attract businesses and achieve prosperity for all our citizens.

Had the industry been asked for information or otherwise involved in the process of information gathering for this report, it could have remedied the obvious errors and dubious conclusions in this report before they entered the public discourse.

The information below details how slides 51 and 52 of BCFCF Report, particularly the claim about average download speeds in Connecticut, are wrong:

- The data sets used in slides 51 and 52 of the BCFCF Report originate from the FCC's Consumer Broadband Tests.¹ This is a pilot program, or a beta test, run by the FCC for self-selecting participants. The FCC is not intending for this to be a scientifically representative sample. In addition, the tests do not compare performance to the service level that the consumer purchased nor what was available to that consumer. The FCC's website clearly states that these beta tests are merely intended to help consumers get additional information about the quality of their particular broadband connection. The FCC does not state that the results should be used

¹ National Broadband Map, "Source >> Summarize," available at broadbandmap.gov.

to extrapolate performance over geographic areas such as an entire state. The FCC uses another testing methodology for this purpose, which is discussed in detail below. The authors of the report should never have used this data to discern anything about Connecticut's average broadband speeds.

Independent reports conducted by reliable sources according to accepted scientific practices consistently show Connecticut to be a ***national leader***, not just on broadband download speeds but also across a wide array of IT infrastructure. For example, based on the most comprehensive dataset available—the FCC's annual Broadband Progress Report—Connecticut has the ***highest percentage*** of the population with access to 25/3 Mbps of any state—only 1% lack such access.² In addition, a more comprehensive data set used in The National Broadband Map shows that a vast majority of the Connecticut population has access to wireline broadband speeds of ***upwards of 100 Mbps***.³ This data demonstrates that Connecticut has vibrant and robust communications capabilities, a bright spot for the state in attracting and sustaining economic investment and growth.

The National Broadband Map data also shows that 98.8% of Connecticut's population has access to 25 Mbps or faster wireline download speeds,⁴ and ranks Connecticut as ***second in the nation*** for the percentage of population (99.5%)⁵ with access to wireline speeds of at least 3 Mbps versus number one ranked New Jersey.⁶ Drilling down further:⁷

- 99.3% of Connecticut's population has access to 10Mbps or faster versus 92.9% nationwide
- 98.8% of Connecticut's population has access to 25Mbps or faster versus 85.3% nationwide
- 98.8% of Connecticut's population has access to 50Mbps or faster versus 83.2% nationwide
- 96.7% of Connecticut's population has access to 100Mbps or faster versus 64.8% nationwide

This broadband deployment data has only improved since the time this data was collected – June 30, 2014.⁸

The authors of the report could have also looked to the FCC's Measuring Broadband America Report (MBA Report) to assess statewide broadband availability and quality. Unlike the beta tests discussed above, the MBA Report relies on a more random sampling of Internet users matched to overall state and region characteristics across ISPs and technologies using data filed by ISPs with the FCC.⁹ The latest FCC's MBA Report (as of September 2014) found that Connecticut had the second highest average download speeds

² FCC 2016 Broadband Progress Report, Released January 29, 2016

³ National Broadband Map, "Analyze >> Summarize >> State >> Connecticut," available at broadbandmap.gov.

⁴ National Broadband Map, "Analyze >> Summarize >> State >> Connecticut," available at broadbandmap.gov.

⁵ National Broadband Map, "Analyze >> Summarize >> State >> Connecticut," available at broadbandmap.gov.

⁶ National Broadband Map, "Analyze >> Rank >> State >> Within Nation >> Metric >> Speed Download Greater than 3 Mbps Upload Greater than 0.768 Mbps," available at broadbandmap.gov.

⁷ National Broadband Map, "Analyze >> Summarize >> State >> Connecticut," available at broadbandmap.gov.

⁸ See *id.* Although the FCC has collected more recent data as part of its Form 477, which it uses in its annual broadband progress report, this data has not yet been updated in the National Broadband Map.

⁹ Federal Communications Commission Office of Engineering and Technology and Consumer and Governmental Affairs Bureau, "2015 Measuring Broadband America Fixed Broadband Report" (Dec. 30, 2015), available at <https://www.fcc.gov/reports-research/reports/measuring-broadband-america/measuring-broadband-america-2015>

in the United States—Connecticut’s average download speed was 46.94 Mbps as of September, 2014. This is significantly higher than the 6.3 Mbps average home download speed that the BCFCF Report claimed.

Clearly, when using the appropriate methodology, it is unambiguous that Connecticut is a national leader in broadband download speeds.

In fact, given the above, it would have been appropriate to consider recognizing broadband as one of the “distinctive assets” the report highlights about Connecticut.

While we appreciate the erroneous broadband slides have been removed from public view, it is imperative that the Commission now correct, recognize and promote the true broadband capabilities of Connecticut. Instead of perpetuating the specious notion that the state’s broadband is substandard, we urge the Commission to take action, in recognition of the private sector’s ongoing investment in, and successful delivery of, high performance communications services within the state, to position Connecticut’s robust Internet facilities and performance as a business asset to attract more economic investment and expansion in Connecticut.

As such, we would respectfully request, in the spirit of the good faith dialogue on the report invited by the Commission at their April 8th meeting in Hartford, that the Commission have the authors of the report clarify and affirm the broadband data errors cited above.

John R. Emra
President
AT&T Connecticut
je4598@att.com

Paul R. Cianelli
President
New England Cable and
Telecommunications
Association
pcianelli@necta.info

Michael J. Cicchetti
Director, Government and
External Affairs
Frontier Communications
Michael.cicchetti@ftr.com