

From: Sophia Cazanis
To: CA Broadband Council; Tom, Stephanie@CIO
Cc: Steve Carlson; Jonathan Arambel
Subject: CTIA Comment Letter - CA Broadband Council Friday,
Date: November 20, 2020 11:13:12 AM
Attachments: [11-20-2020 FINAL CTIA CA BB Council Comments.pdf](#)

Hi,

Attached please find CTIA's comment letter to the Broadband Action Plan.

We appreciate the opportunity to being included, and if you need additional formation or have questions regarding our letter, please feel free to contact Steve Carlson @ [REDACTED]

Thank you in advance,
Sophia

Sophia Cazanis

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November 20, 2020

Ms. Stephanie Tom
Deputy Director, Broadband and Digital Literacy
California Department of Technology

SENT VIA EMAIL: CABroadbandCouncil@state.ca.gov

RE: Governor's Executive Order N-73-20
State Broadband Action Plan

Dear Ms. Tom,

On behalf of CTIA^{®1}, the trade association for the wireless communications industry, thank you again for the opportunity to engage with the California Broadband Council and to address key policies for our shared goal of providing mobile broadband to the citizens of California.

Broadband is how we live today. It is integral to Californians regardless of income level, age, and region, inner city to rural. It is not only important for operating our businesses and our economy, it is a critical driver of both, boosting GDP, creating jobs, drawing investment and promoting productivity.

In our initial comments dated October 25, we pointed out the indispensable role wireless has and, in an even greater way, will play in the future in addressing broadband in California. Over most of this year, the COVID-19 pandemic has presented the ultimate stress tests for wireless networks, and wireless providers have worked tirelessly and effectively to keep California communities connected when they needed it most.

As communities have adapted to a world with COVID-19, it is clearer than ever before mobile broadband connectivity and access are critical to lives and livelihoods. In our comments, we described the role wireless is playing in working to bridge the digital divide, its increased importance during the pandemic for telemedicine, remote learning, working remotely, agricultural innovation, public safety and much, much more.

¹ CTIA[®] (www.ctia.org) represents the U.S. wireless communications industry and the companies throughout the mobile ecosystem that enable Americans to lead a 21st-century connected life. The association's members include wireless carriers, device manufacturers, suppliers as well as apps and content companies. CTIA vigorously advocates at all levels of government for policies that foster continued wireless innovation and investment. The association also coordinates the industry's voluntary best practices, hosts educational events that promote the wireless industry, and co-produces the industry's leading wireless tradeshow. CTIA was founded in 1984.



America's wireless networks have continued to meet increased demands for connectivity and capacity in large part due to the light-touch regulatory approach that applies to wireless at the national level. We are able to work collaboratively with policymakers and stakeholders to expand opportunities in urban, rural, and tribal communities across California.

Further, in our last set of comments we also highlighted examples of initiatives in which our members are working directly with state governments, including partnering with local leaders and school districts to deliver devices and connectivity to students as they learn from home. While we have been able to help answer immediate needs in ways like these, long-term, structural disparities certainly remain in access to broadband across our state. Those are disparities we are committed to resolving in working with the California Broadband Council and partners across the state. We are all familiar with the challenges.

We are confident, working together, we can meet these challenges by building on the momentum of the gains achieved in recent years, that have boosted GDP and helped create jobs as broadband access expands. In 2019 alone, the wireless industry built more than 46,000 new cell sites across the United States.² An economic study in 2019 determined that over the previous decade the wireless industry was a leading generator of new jobs, generated nearly 10 percent of the increase in the GDP of the entire U.S. economy, and invested \$261 billion in expanding wireless networks.³

During that period, download speeds increased more than 30 times after the wireless industry invested in spectrum, infrastructure, and new technologies to improve service and expand coverage to rural and underserved areas. The wireless industry is investing hundreds of billions of dollars and building wireless facilities that are needed to provide expanded high-speed networks. That investment is critical to increasing the availability of broadband to Californians.

This massive growth and investment in wireless service was fostered by the deregulatory paradigm that the United States Congress presciently enacted more than two decades ago and continues to follow. Specifically, beginning in 1993, and in successive legislation in 1996 and 2012, Congress adopted and has adhered to a light-touch regulatory framework for wireless services that relies on competition, not regulation, to drive growth and investment. That framework has been an unqualified success, leading to investment in successive generations of wireless technology that has enormously benefited consumers and the U.S. economy.

While much of the current success has been based on a 'light-touch' regulatory approach at the federal level, inconsistent approaches to infrastructure deployment at the local level has created consistent and significant obstacles adding costs and delays. This has become ever more critical as we endeavor to meet speed, capacity and latency demands driven by the economic environment around the pandemic, including working to deploy small cell/5G technology. A clearer, more consistent set of local regulatory guidelines for deployment of mobile broadband would accelerate progress.

² *Order Instituting Rulemaking Regarding Broadband Infrastructure Deployment to Support Service Providers in the State of California*, R20-09-001, Order Instituting Rulemaking (issued Sept.18, 2020) (OIR).

³ Recon Analytics, *The 4G Decade: Quantifying the Benefits*, at 5 (July 29, 2020) <http://reconanalytics.com/wp-content/uploads/2020/07/The-4G-Decade-1.pdf> (Recon Analytics 4G Study) (link triggers download).



As we continue to engage with the California Broadband Council, we have a number of observations and questions for consideration we hope will help move the partnership forward:

- The Draft Broadband Action Plan does not adequately recognize the unsubsidized contributions from wireless and other telecom providers, instead largely focusing on purported negatives.
- We should identify and build on successes, looking for ways to remove obstacles and accomplish the desired goals without public taxpayer dollars. As we've noted throughout the comment process, the wireless industry continues to make the necessary investments in order to provide robust mobile broadband throughout California.
- 5G will be an important technology to address a significant portion of these issues but the draft report does not acknowledge that; though, it notes the significant wireless adoption rate in certain communities.
- As we look to short-term and long-term efforts to ensure everyone in California has access to affordable, reliable, high-speed internet, it is essential we first consider what data is publicly available. We must know our benchmarks before we can set realistic targets and goals.
- Indeed, much of the data-gathering work that the Broadband Council suggests needs to happen, has already been done and CTIA recommends that the Council take inventory of the data on available speeds and coverage maps published by the Federal Communications Commission (FCC) and CPUC.

While there is a necessary role for government and subsidies in addressing many of these items, the Draft Broadband Action Plan, unfortunately, should be more balanced in looking for collaborations that could greatly accelerate deployment without public taxpayer dollars, as noted above.

These considerations are critical as we prioritize strategic investments in broadband infrastructure across the state. For example, we should not waste valuable resources seeking to reach those who are satisfied with broadband from their smartphone or fixed wireless broadband to wired-only services.

Wireless penetration via smartphone, desktop, laptop, or tablet has increased to 108% in California – meaning there are more wireless devices than people in California.⁴ Yet in its current form, it is not clear that the Draft Broadband Action Plan adequately accounts for wireless service.

The Draft Action Plan tends to refer to “the network” as only one thing - one service. But that is not how communications networks work. There are many networks offering different technologies,

⁴ https://www.ctia.org/4g-assets/WirelessImpact_CA.pdf



ranging from fixed wireless to mobile wireless to wired broadband service. Different service products are available in California markets, each suited for different consumer needs.

The Broadband Council will be best served by adopting policies that incentivize all types of providers to be part of the solution to deliver high-quality, reliable broadband to hard-to-reach communities in California.

A key to promoting the deployment of broadband services will be identifying commonsense relief for the often burdensome regulatory and permitting processes for installation of new wireless equipment. Streamlined CEQA processes, a set timeline for local permitting review, maximizing deployment for public rights-of-way, and reasonable application fees and permitting fees (in conformance with federal law) would all help accelerate deployment of broadband infrastructure.

CTIA looks forward to working with you to identify and prioritize policies and opportunities to improve the deployment of mobile broadband infrastructure in California.

Sincerely,

Bethanne Cooley
Assistant Vice President, State Legislative Affairs