



Solutions2020 Proposal – Middle Mile Support

The American Cable Association appreciates Commissioner Clyburn’s commitment to ensure that providers of high speed broadband Internet access service (“BIAS”) can rapidly deploy and upgrade their infrastructure at the lowest cost. Most especially for smaller providers, the Commission can facilitate deployments by regularly ensuring its pole attachments regulations provide expeditious access at reasonable cost. The Commission also needs to examine the extent to which smaller BIAS providers operating in rural areas have access to high bandwidth middle mile transport service at reasonable cost.

BIAS providers are just one part of the complex web of interconnecting networks that connect end-users to the Internet. BIAS providers originate and terminate users’ Internet transmissions and exchange this traffic with other network providers at various interconnection points, including Internet exchange points (points of presence) where most national and global networks meet, or at other points of aggregation where transit providers or content distribution networks interconnect. Small BIAS providers that serve rural areas are more likely than their larger, urban counterparts to require third party transport services to reach these interconnection points, and due to a lack of competition among transport service providers, the transport available to them is either insufficiently robust to support high-speed BIAS service, or is priced unreasonably. Moreover, these small providers cannot afford to build transport because they do not have enough subscribers (demand) to offset the significant cost.

To support the availability of affordable advanced telecommunications service, the Commission should undertake, as part of its annual Section 706 Broadband Progress Report, an examination of the marketplace for middle mile transport services in rural areas. If the Commission determines that sufficiently robust transport service does not exist in an area, or that the cost is unreasonable, it should develop remedies to address these problems. The Commission should also seek to adopt and implement other mechanisms to encourage the deployment of robust middle mile infrastructure to rural areas, including by removing barriers to entry, so that small BIAS providers have a choice of transport service providers or financially viable means of deploying their own transport.

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