



January 10, 2017

Commissioner Mignon Clyburn  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington DC 20554

Re: Solutions 2020 Call to Action Plan

#SOLUTIONS2020 Comments from Next Century Cities

Next Century Cities is a nationwide coalition of more than 160 mayors and local government leaders committed to ensuring the benefits of fast, affordable, reliable broadband internet access for their communities.

Next Century Cities broadly supports many of the policies identified by Commissioner Mignon Clyburn in the #Solutions2020 Call to Action Plan and welcomes the opportunity to comment. In particular, Next Century Cities supports ensuring affordable access to next-generation networks and giving local governments a strong role in forming a national broadband policy, as well as additional components of the #Solutions2020 plan that our members have highlighted as priorities.

**Ensuring Affordable Access**

Next Century Cities applauds the Federal Communications Commission (FCC) for its 2016 Lifeline Modernization Order and strongly encourages efforts to further raise awareness among eligible households by making Lifeline information available at common touchpoints as stated in the report and recommended by EveryoneOn.

To encourage investment in better networks and competition among networks, Next Century Cities has supported “One-Touch Make-Ready” policies that several local governments have already enacted. Our member communities have seen that simplifying pole attachment rules can encourage more investment if done correctly, particularly when local governments and communities are involved in the process as they must ultimately safeguard the rights-of-way.

A key principle for Next Century Cities is that “Collaboration Benefits All” and we strongly support the call for “public-private, public-public, and private-private partnerships on both the supply and demand side” found in the #Solutions2020 plan. We believe that smart partnerships are a key component in ensuring all Americans can have high quality internet access.

### **Empowering Communities**

Next Century Cities is enthusiastic that the need to empower communities and local leaders receives so much emphasis in the #Solutions2020 Plan. Local governments have played important roles as both investors and innovators in improving internet access, which is why Next Century Cities was founded in 2014, and continues to grow.

All the mayors and local government leaders who are part of Next Century Cities know and firmly agree that “State and local leaders are on the front-lines.” Given the many challenges facing the federal and state governments, local governments will need to provide continued leadership to ensure their businesses and residents have the networks they need to thrive.

Additionally, Next Century Cities agrees with American Rural sentiments that communications policies must reflect the geographic and demographic diversity of the nation. Our member communities, range from small towns to very large cities and counties. Within a single state, the challenges and assets vary tremendously from community to community. Improving internet access is a matter that requires local attention and collaboration, and each community should have the ability to achieve the broadband solution that is right for their residents.

A key principle our 160 mayors and city leaders have agreed to is that communities must enjoy self-determination. We strongly oppose efforts at higher levels of government to restrict local authority to invest or partner to improve connectivity. We also agree that the FCC’s Office of Native Affairs should be empowered as a standalone office as an important step to resolving the dramatic lack of access common to many tribal areas.

### **5G and Beyond**

Next Century Cities is working with our member communities nationwide to share best practices that will allow more Americans to access next-generation, high-quality broadband., including speeding the deployment of small cells, Distributed Antenna Systems (DAS), and other wireless devices. Given the tremendous amount of investment that will be necessary for deploying these networks, the private and public sectors must collaborate to deliver the benefits of new wireless technologies widely. However, our members fear that the actions of some wireless firms to restrict local authority via legislation that would make collaboration on wireless attachments more difficult.

Next Century Cities member are also strongly supportive of protecting and expanding unlicensed spectrum. Our communities depend on technologies that use unlicensed spectrum in their schools, police stations, public works departments, hospitals, and just about every place that is dependent on modern technology. These technologies allow anyone – from the small business entrepreneur to the public works employee – to use crucial technologies without having to wait for permission or pay heavy fees. It is essential to the modern city and it was important to include in the #Solutions2020 Plan.

### **Conclusion**

Next Century Cities, representing more than 160 mayors and local government leaders nationwide, broadly supports the #Solutions2020 Call to Action Plan and believes that it sets a good framework for improving internet access for Americans in the future. We look forward to partnering with Commissioner Clyburn, the full FCC, and other broadband champions in the federal government to realize the goals of #Solutions2020 and to help increase access to fast, affordable, reliable broadband.