

The Nebraska Cable Communications Association (NCCA) is the primary trade association for the cable broadband industry in Nebraska. The companies and affiliate members of the NCCA include Fortune 500 companies and community-based independent operators that provide video, broadband and competitive voice services to Nebraska residences, businesses and public entities.

In Nebraska alone, the economic impact of the cable industry is more than \$2 billion, employing more than 1,500 individuals resulting in nearly 15,000 direct and indirect jobs. The cable industry provides state-of-the-art cable television services to over 51 million American consumers nationally. The cable industry is also the nation's largest broadband provider of high-speed internet access, serving more than 66 million customers and investing over \$290 billion in capital infrastructure throughout the last 20 years.

As connectivity and customer service companies, the cable industry understands the desire to expand access to new products and services. In a highly competitive marketplace, cable has and continues to pioneer new innovations to meet and exceed our customer's needs. Some examples include:

- Cox is pioneering smart city applications that combine people, connected devices, data and processes to improve city operations and the citizen experience. In addition, Cox is deploying Gigablast (1 gig internet speeds) across its footprint, including Nebraska.
- Charter Communications now offers Spectrum Internet Gig across the entire footprint in Nebraska.
- CableONE offers GigaONE, a gigabit connection using DOCSIS 3.0 technology across Northeast Nebraska.
- Eagle Communications is pushing fiber deeper into its network increasing speed and reliability. Recent investments include the completion of a fiber ring throughout its footprint in the Platte Valley for reliability. This extends fiber to commercial business who need gigabit speeds with fast and reliable access to the cloud or other regional and corporate offices.

In January, the National Cable Communications Association and Cable Labs announced plans for delivering 10 gigabit networks. 10G will enable consumers to take advantage of new innovations like super high definition TV as well as enable new approaches in home health care, education, and business. Advancements in new hardware, software and techniques will allow cable companies to deploy symmetrical 10 gig speeds utilizing our existing networks. Lab trials are currently underway with field trials likely to begin in 2020. The hope is we can begin deployment a few years afterwards.

In addition to increasing internet speeds, the cable broadband industry is helping to close the digital divide by connecting families to the internet. All the members of the NCCA offer low-cost internet plans that meet or exceed the FCC's definition of high-speed broadband. These broadband adoption programs help families connect, complete homework, apply for jobs or start their own businesses.

As you can see, the members of the NCCA are leading the charge to close the digital divide and deliver the services our customers demand. With this in mind, we would like to provide some initial comments for your consideration as you begin to finalize the first report. We will also review the final draft and provide more detailed comments in writing.

First, we appreciate the wisdom of the Task Force to prioritize unserved areas first. The cable industry has made significant investments in our networks to improve the customers' experience – without subsidies from federal or state governments. Given that government resources are finite, any state-sponsored effort to expand access to broadband should ensure that everyone gets firsts before anyone gets seconds.

Second, thank you for affirming that government-owned networks are not a viable solution for expanding broadband in Nebraska. Repealing the current law regarding public entry would threaten private investment in the state and be a risky financial investment for taxpayers. We would encourage caution regarding any potential changes to the statutes governing the lease of dark fiber by public entities. Careful attention must be given to limit the use of dark fiber to reach areas that are currently unserved, not overbuild existing networks that have been built with private capital. **To the extent consideration is given to broadband cooperatives, the same scrutiny should apply to prevent overbuilding of private capital or, in the case of electric cooperatives, cross-subsidization from electric rate payers.**

Third, if the Task Force decides to recommend a state broadband grant, the program should have a transparent application process, be open to all providers and technology neutral, and include a robust challenge process to prevent overbuilding of existing networks. The program should also include adequate accountability to ensure that the grant funds are used for their intended purpose. However, we encourage the Task Force to resist using an outdated regulatory regime developed for landline telecommunications as a model for expanding access to broadband. Requiring a grant applicant to be a registered ETC or to serve a telecommunications exchange would discourage participation from broadband providers like the cable industry. Accountability of grant funds is important but it can be done in a way that is forward-thinking and encourages competition among companies and technologies in the grant process.

Finally, Broadband maps are a tool to help identify areas that currently lack broadband service and we recognize that the current FCC Form 477 data has its shortcomings. In early August, the FCC reformed its broadband data collection process to require that fixed broadband providers submit polygon shape files showing where they can provide service. The FCC will also incorporate crowdsourcing tools to help refine and improve the accuracy of data. While a state broadband map can be a tool in this process, there are efficient and cost-effective means of identifying unserved areas that do not require the devotion of scarce state resources to duplicative mapping projects. We encourage the Task Force give the FCC time to implement the new data collection process before considering creation of a state-specific map for Nebraska.

Thank you, again, for your efforts on this important issue. The members of the NCCA stand ready to support your efforts to expand broadband service to rural areas of Nebraska.