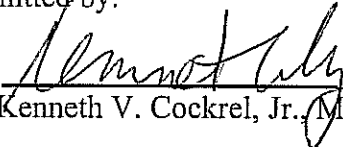


**Before the
DEPARTMENT OF COMMERCE
NATIONAL TELECOMMUNICATIONS AND
INFORMATION ADMINISTRATION
Washington, DC**

In the Matter of)
)
American Recovery and Reinvestment) Docket No. 090309298-9299-01
Act of 2009)
Broadband Initiatives)

COMMENTS OF THE CITY OF DETROIT

Submitted by:

By: 
Kenneth V. Cockrel, Jr. Mayor

City of Detroit
Executive Office
Coleman A. Young Municipal Center
2 Woodward Ave., Ste. 1126
Detroit, MI 48226

April 13, 2009

The City of Detroit (DETROIT) submits these comments in response to the Joint Request for Information and Notice of Public Meetings (“Joint Request”) issued March 9, 2009 by the Department of Commerce, National Telecommunications and Information Administration, and Department of Agriculture, Rural Utilities Service,¹ addressing the development of rules and policies for the Broadband Technology Opportunities Program (BTOP) of the NTIA, as provided in the American Recovery and Reinvestment Act of 2009 (the Recovery Act).

Introduction

The City of Detroit is the 11th largest city in the United States. It is home to the U.S. automotive industry, about one million people, well respected sports teams, some of the finest hospitals and one of the top universities in the country. It is also home to the highest unemployment rate in large cities in the country (22.2% in January and climbing), one of the highest foreclosure rates in the country, and a shrinking population. Our prospects with the further troubles of the automotive industry are not promising.

We are proud of our city and are working hard to improve education, diversify our industries and workforce, create jobs, retain our graduating youth and attract new residents. Broadband can and will play a key role in these efforts and help move Detroit forward, if we can foster widespread availability and adoption, and if we can be among the major cities that participates in the rollout of 4th generation wireless broadband services. Unfortunately for us, given our current economic state, we are not a top prospect for commercial investment in new broadband services. Thus, we cannot expect

¹*American Recovery and Reinvestment Act of 2009 Broadband Initiatives, Joint Request for Information and Notice of Public Meetings*, 47 Fed Reg 10716 (March 12, 2009).

to have such services in the foreseeable future unless stimulus funds can be tapped as incentives.

Broadband is Key to Our Future

The City of Detroit has recognized the importance of accessible broadband services for many years. Early exploration of the potential of municipal WiFi services failed to result in a viable business plan for Detroit, as was the case for most such initiatives in other cities. A study conducted in 2006 with the assistance of the Knight Foundation noted the value of broadband access for education, health and jobs in the City of Detroit, but once again there were no easy answers as to how to provide such access.

Commercial deployment by the cable companies and telephone companies covers much, but not all, of the city. Even so, only 40% of the population has broadband in their homes. There is not sufficient competition to bring the cost of access down to a level that it is affordable for the majority of our residents.

We look with great interest upon the stimulus funding to be made available for broadband through the National Telecommunications and Information Administration. Such funding could enable the deployment of affordable services and is critical to the revitalization of Detroit. Therefore we strongly urge the NTIA to adopt rules that are favorable to urban communities such as Detroit. There are two key areas to which we draw attention: the terms “unserved” and “underserved” and the importance of wireless, not just wired, broadband.

Unserved/Underserved in Urban Areas

We certainly support the extension of broadband availability to those areas of the country which have none or in which there is insufficient competition to provide high

enough data rates at reasonable costs. However, we also want to ensure that urban areas are not excluded from consideration for funding just because a telecommunications or cable company claims an area is “covered.” In any area, rural or urban, where there is insufficient competition, rates remain too high and make broadband inaccessible to many (the situation in Detroit). Bringing in other providers (and thus added competition) will lower costs, increase the participation of our citizenry in today’s broadband, online communities and make available a wide array of work and personal opportunities. This is essential for improving the quality of life, and the future, of our city.

The Importance of Wireless

We also want to ensure that wireless solutions are not disadvantaged in the upcoming application process. Wireless, especially wireless with mobility, offers distinct advantages and enhanced attractiveness to areas that can boast its availability. Wireless is easier, cheaper and faster to deploy. It promises to lower the cost of broadband access for our citizens and provide the benefits of broadband access more quickly than other potential solutions.

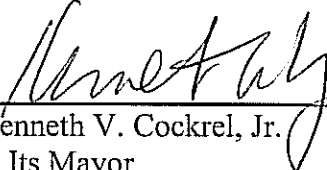
Mobility makes possible efficiencies and improved services in our police and fire operations and in our field service crews. Most importantly, mobile broadband wireless in Detroit will ensure that Detroit is an attractive place to live and work in this age of technology. The youth of today are a mobile youth, used to working, learning and playing through mobile devices. If Detroit wishes to attract and retain its youth, it must have this capability sooner, not later.

Summary

We believe that a Detroit that has widespread broadband usage, both wired and wireless, will be a revitalized Detroit that connects our citizenry; supports education, health care and jobs, and attracts new residents and economic development to our city. Therefore, we urge NTIA to adopt rules that do not exclude urban communities but rather embrace them, and to adopt rules that foster quick deployment of mobile, broadband wireless solutions for the many benefits, including jobs, that these will bring.

Respectfully submitted,

THE CITY OF DETROIT, MICHIGAN

By: 
Kenneth V. Cockrel, Jr.
Its Mayor