



BEFORE THE COMMITTEE ON COMMERCE AND ECONOMIC DEVELOPMENT

AN ACT RELATING TO TELECOMMUNICATIONS OMNIBUS BILL

The New England Cable & Telecommunications Association, Inc. (NECTA) represents Vermont's cable telecommunications companies that compete to provide advanced broadband, voice and video products and services to our state's business and residential consumers. NECTA offers these brief comments regarding An Act Relating to Telecommunications, Omnibus Bill.

I. NECTA supports the comments of Comcast. Our goals are preventing more Vermont Universal Service Fund tax increases on our customers and ensuring competitive neutrality.

II. NECTA Proposed Objectives for the legislation:

1. Vermont should focus exclusively on the VUSF goals of achieving universal broadband coverage and funding E-911. Expanding the goals, however laudatory, results in a major tax increase for the customers of communications service providers and a loss of focus on the expanding broadband coverage and E-911 service.

2. End the subsidy of outdated legacy voice networks, High Cost Funds, where there is little transparency over the use of the VUSF funds.

3. Ensure competitive neutrality. For example, a new Section 8 sentence would create a new goal for the connectivity initiative of "[p]rovid[ing] universal availability of mobile telecommunications service throughout the State." Bill, pp. 13-14 (amending current 30 VSA § 7515b). This arguably could be unnecessary and anti-competitive if connectivity goals could be better met via wireline facilities such as provided by cable companies.

4. School capital and equipment grants for broadband access should be funded fairly by general purpose revenues not focused exclusively on customers of communications services. The proposal to use \$1.2 million from the General Fund is fair and reasonable.

5. Section 1 proposes to adjust the current standards for review of interconnected telecommunications facilities to give more weight to municipal telecommunications policies. Specifically, Section 1 would be amended to include a new subsection requiring "deference" to municipal policies relative to telecommunications facilities even if exempted from other municipal approvals. Bill, pp. 2, 7-8. Another new section grants the Board discretion to decline such deference if the local policies preclude construction of facilities that otherwise would promote the general good. (Id., pp. 6-7). While this section does not directly affect us, it does

create a substantial impediment to telecommunications and broadband deployment in the state. It is a concept that will potentially make timely deployment an issue for everyone.

Thank you for this opportunity to present our views. NECTA is available to work with your Committee as you continue to consider this important policy issue.

Respectfully submitted,

Dated: March 9, 2016

A handwritten signature in black ink that reads "Paul R. Cianelli". The signature is written in a cursive style with a horizontal line underneath the name.

Paul R. Cianelli

President/CEO

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