



Advocacy: the voice of small business in government

Testimony of

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***U.S. Senate
Committee on Small Business and Entrepreneurship***

Date: April 27, 2010
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Russell Senate Office Building
Washington, D.C.
Topic: Connecting Main Street to the World: Federal Efforts to
Expand Small Business Internet Access

Created by Congress in 1976, the Office of Advocacy of the U.S. Small Business Administration (SBA) is an independent voice for small business within the federal government. The Chief Counsel for Advocacy, who is appointed by the President and confirmed by the U.S. Senate, directs the office. The Chief Counsel advances the views, concerns, and interests of small business before Congress, the White House, federal agencies, federal courts, and state policy makers. Issues are identified through economic research, policy analyses, and small business outreach. The Chief Counsel's efforts are supported by offices in Washington, D.C., and by Regional Advocates. For more information about the Office of Advocacy, visit <http://www.sba.gov/advo>, or call (202) 205-6533.

Chair Landrieu, Ranking Member Snowe, and members of the Committee, good morning and thank you for the opportunity to appear before you today. My name is Susan Walthall and I am the Acting Chief Counsel for the Office of Advocacy at the U.S. Small Business Administration (SBA). Congress established the Office of Advocacy in 1976 to represent the views of small entities before federal agencies and Congress. Advocacy is tasked with ensuring federal agencies' compliance with the Regulatory Flexibility Act (RFA). As Advocacy is an independent office, the views expressed in this testimony do not necessarily reflect the position of the Administration or the SBA. Our office conducts research on important small business issues and echoes the concerns of small businesses on these issues.

Advocacy has been and continues to be active on a number of small business broadband issues. We have filed comment letters on the guidelines for the Broadband Technologies Opportunities Program (BTOP) and the Broadband Initiative Program (BIP), the FCC's consultative role, and the national rural broadband strategy.¹ In addition, we have advocated for increased access to spectrum by small businesses through the FCC's designated entity program,² special access reform,³ and a competitive regulatory approach to the U.S. telecommunications industry.⁴

I would like to commend Congress and our federal partners for their work to expand broadband access and to increase broadband adoption by small business customers throughout this country. Advocacy was pleased to see the Commission's focus on competition in Chapter 4 of the National Broadband Plan, as well as the detailed recommendations for economic

¹ Comments of the Office of Advocacy Filed with both the FCC and the NTIA, GN Docket No. 09-40, NTIA/RUS Docket No. 090309298-9299-01 (filed April 13, 2010), comments of the Office of Advocacy filed with NTIA, NTIA/RUS Docket No. 090309298-9299-01 (filed April 13, 2010). All Advocacy comments cited here can be found at www.sba.gov/advo/laws/comments/telecommunications.html and are listed from 2001 on in Appendix A.

² Comments of the Office of Advocacy, WT Docket No. 06-150, PS Docket No. 06-229 (filed May 21, 2007).

³ Comments of the Office of Advocacy, WC Docket No. 05-25 (filed Aug. 8, 2007).

⁴ Comments of the Office of Advocacy, WC Docket No. 07-97 (filed July 25, 2008).

opportunity and entrepreneurship in Chapter 13.⁵ We hope that the FCC will continue to consider the small business impacts in its ongoing and future rulemakings related to the National Broadband Plan.

In addition, my office was pleased with the National Telecommunications and Information Administration's (NTIA) efforts to include small and socially and economically disadvantaged businesses (SDBs) in the Recovery Act's broadband programs. Advocacy participated in a number of interagency coordination meetings to ensure that small businesses had a meaningful opportunity to participate in these funding programs. We assisted NTIA with a letter to the SBA Administrator, in an attempt to raise the threshold defining small business. We were pleased to hear that several businesses chose to partner with SDBs on these projects.⁶

My testimony today will focus on three key areas. First, I will highlight the importance of small businesses as economic drivers and customers of advanced telecommunications services. Second, I will explain the challenges faced by small business providers. Finally, I will discuss the study that my office is conducting on broadband and small business, as directed by this committee under the Broadband Data Improvement Act of 2008.⁷

⁵ Connecting America: the National Broadband Plan, www.broadband.gov/plan/.

⁶ Preliminary numbers from NTIA on Phase 1 of the Recovery Act grants show that 31 projects had SDB partners and that at least 8 small businesses received awards totaling over \$73 million.

⁷ 122 Stat. 4096 Public law 110-385- October 10, 2008.

Small Business and Broadband

Small business is a key driver of our economy. Recent data show that small businesses make up 99.7 percent of all U.S. employer businesses, and employ just over half of all private sector employees. These small entities have generated 64 percent of net new jobs over the past 15 years, and have created half of the non-farm gross domestic product.⁸

Small business is also a key driver in our innovation economy, producing 13 times more patents per employee than large patenting firms. These patents tend to be cited more frequently than those of large firms. Finally, small businesses make up 97.3 percent of all identified exporters and produced 30.2 percent of the known export value in 2007.⁹

While these data demonstrate the importance of small businesses to the economy, there exists the potential for even greater small business contributions to economic growth and job creation. Broadband is a transformative technology that allows small businesses throughout the U.S. to access customers throughout the world. We need to ensure that they have affordable access to adequate speeds of broadband so they can take advantage of the expanded markets and opportunities to innovate. The best way to achieve this goal is by fostering a competitive regulatory environment that reduces price and expands service. Ultimately, with access to affordable broadband technology, small businesses in rural and low-income areas can not only improve their efficiency, but can also access advanced applications and services, all while introducing their products to new markets around the globe.

⁸ U.S. Small Administration, Office of Advocacy, Frequently Asked Questions (Sept 2009), available at <http://web.sba.gov/faqs/faqindex.cfm?areaID=24>.

⁹ *Id.*, see also CHI Research Inc., *Small Serial Innovators: the Small Firm Contribution to Technical Change*, study funded by the Office of Advocacy, SBA, under contract No. SBAHQ-01-C-0149 published Feb 27, 2003, <http://www.sba.gov/advo/research/rs225tot.pdf>.

Small Business Broadband Providers

Small businesses are not merely customers of advanced technology; many have made significant investments in our telecommunications infrastructure and have focused on serving rural and other underserved areas. We need small broadband providers across all platforms to continue to invest in building out their networks, to find ways to collaborate with local community partners, and to tailor their services to meet the specific needs of their communities.

A small group from my office visited the offices of *MetroCast*, a small independent cable operator in St Mary's County in rural Maryland. The group discussed the technological difficulties they were facing in connecting two service areas separated by inaccessible terrain, and showed us the communities they served. *Metrocast*, like most small telecommunications providers, is flexible in its offerings and very responsive to the needs and circumstances of the environment it operates in.

While the National Plan focuses on the provision of broadband to small business customers, it is critical that the Commission also recognize the unique barriers that exist for small broadband providers. Many of these small providers bring special value to the marketplace. First, they support Congress' goals set forth in the Telecommunications Act of 1996 by offering competitive services and pricing.^{10,11} Second, they fulfill the National Plan's focus on expanding service to unserved and underserved areas. Finally, their presence in local

¹⁰ In the wake of the 1996 Act and the FCC regulations that ensued, thousands of Internet Service Providers (ISPs) sprung up and started providing a slew of new generation services to the communities in which they operated. They were responding to the incentive structure put forth by the 1996 Act, which allowed the incumbents access to interlata services under the condition that they "unbundled" the local loop to allow for intralata competition. Unbundled Network Elements (UNEs) allowed ISPs to provide local competition. A significant portion stopped operating; about 7,000 ISPs went out of business as result of the decisions taken in FCC rulings. See Advocacy's letter, Appropriate Framework for Broadband Access to the Internet over Wireline Facilities (CC Dkt. No. 02-33), available at http://www.sba.gov/advo/laws/comments/fcc02_0827.pdf.

¹¹ Pub. L. No. 104-104, 110 Stat. 56, *codified at* 47 U.S.C. §§ 151.

communities has a value in and of itself, providing high tech jobs and strengthening local economies.¹²

The National Broadband Plan addresses several key issues of relevance to small business telecommunication providers' ability to participate and compete. These include special access and acquisition of spectrum.

Under the Telecommunications Act of 1996, the FCC is required to "promote competition and reduce regulation in order to secure lower prices and higher quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies." Following the "Pricing Flexibility Order" in 1999, which instituted deregulated prices for dedicated access services in metropolitan statistical areas, and the amending of price-cap rules under the "CALLS decision," small carriers have continuously reported increased rates for special access. They have also suggested that the current price of special access specifically demonstrates a lack of competition in the market, because incumbents have been able to raise prices without losing customers. The combination of high prices and few alternatives creates a difficult burden for small carriers trying to conduct business in the telecommunications market.¹³

Advocacy is committed to working with the FCC to ensure that small entities have access to acquiring spectrum. To ensure this access, Advocacy urges the FCC to consider amending its designated entity (DE) rules, which allow smaller companies that qualify as DEs to compete in spectrum auctions with the use of "bidding credits." As Advocacy has noted in previous comment letters, the 2006 revision to these rules has encumbered small business participation in

¹² According to the U.S. Bureau of the Census, 98 percent of telecommunication providers are small (NAICS 517) and of all 4,914 internet service providers and web search portals (NAICS 5181), 4,834 are small businesses (98 percent). For the category comprising all Other Information Services (NAICS 51919), 97 percent are small businesses. This is based on data year 2006, the most recent data available.

¹³ Comments of the Office of Advocacy, WC Docket No. 05-25 (filed Aug. 8, 2007)

FCC spectrum auctions.¹⁴ While it seems uncertain what opportunities are left for DEs to meaningfully participate in future spectrum auctions, it is important that we revise these rules so that Congress's intent in creating Section 309(j) of the Communications Act is not diluted.

Advocacy hopes that the Commission will address these issues. Competition between broadband providers will help to spur the development of advanced technologies and services in the marketplace, while reducing prices.

Advocacy also urges the FCC to consider how its future rulemakings will impact small broadband providers. Our office has found that small businesses face a 60 percent higher burden of federal regulatory costs than do their larger counterparts.¹⁵ As the National Broadband Plan is implemented, it is important that the Commission identify how small broadband providers will be affected by changes to FCC rules and policy, and examine what alternatives can achieve the same goals while mitigating any added regulatory burdens.

Advocacy Broadband Study

While a number of studies have examined broadband access and adoption rates among residential users, no research has focused on how small businesses are using broadband, or what their specific technological needs are.¹⁶ In response to this lack of data, the Broadband Data Improvement Act of 2008 directed Advocacy to conduct a study to evaluate broadband

¹⁴ Comments of the Office of Advocacy, WT Docket No. 06-150 (filed May 21, 2007).

¹⁵ Crain, Mark, *The Impacts of Regulatory Costs on Small Firms*, study funded by the Office of Advocacy, U.S. Small Business Administration, contract No. SBAHQ-03-M-0522, released in September 2005 <http://www.sba.gov/advo/research/rs264tot.pdf>.

¹⁶ The Office of Advocacy has funded two research projects based on a dataset gathered using the same survey instrument. In March 2004, the study, *A Survey of Small Businesses Telecommunications Use and Spending* was released, <http://www.sba.gov/advo/research/rs236tot.pdf>; and in December 2005, *Broadband Use by Rural Small Businesses* was released, <http://www.sba.gov/advo/research/rs269tot.pdf>.

availability for small businesses.¹⁷ Senators Landrieu, Snowe, and Kerry were all instrumental in supporting this legislation and spearheading this study. The law requested that Advocacy examine telecommunications service options available to small businesses with respect to price and speed, and to evaluate the economic impact of such availability. I am pleased to report that the study is under way.

The study, due this fall, will provide valuable information on the menu of broadband options currently available to small businesses, and provide Congress with a snapshot of the status quo, before BTOP and BIP. Advocacy intends the study to provide a baseline against which the success of the broadband grant and loan programs can be evaluated. Results of the study will geographically highlight small businesses that are in unserved and underserved areas, and quantify just how limited their service choices are and how this affects the price of broadband. These detailed data, by matching service availability with small business location, will further serve to verify and guide efforts to increase the ability of small service providers to enter the market and offer innovative and competitive new products to these regions. Advocacy looks forward to sharing the results of our study with the Committee.

The National Broadband Plan represents an unprecedented effort to provide universal broadband access in the United States. Small broadband providers will be essential in ensuring that universal access becomes a reality for all Americans. Meanwhile, small business broadband consumers will be among the most strategically placed beneficiaries of increased access and speed, and the lower prices that come with increased competition. In this respect, greater broadband access will serve as an input to the remarkable engine of job creation and economic growth that is American small business. SBA's Office of Advocacy stands ready to work with

¹⁷ Public Law 110-385 Section 105 requested that Advocacy conduct a study to evaluate the options available to small business in terms of telecommunication services with respect to price and speed; and to evaluate the economic impact of such availability.

Congress, the FCC, the Department of Commerce, the Department of Agriculture, and others to ensure that the needs of small businesses are considered as we work to achieve the goal of universal broadband access. Thank you for allowing me to present these views, I would be happy to answer any questions.



[Science, Technology and Innovation Economic Research](#)

**Telecommunications
Regulatory Comments**

2001 - Present

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For prior year communications, please see the [Advocacy Archives](#)

[Letter dated 03/05/10 - Federal Communications Commission](#) [PDF] or [\[text File\]](#) - National Broadband Plan; [GN Docket No. 09-51](#) [PDF File] or [\[text\]](#); [Fact Sheet Summarizing Advocacy's Letter](#).

[Letter dated 04/13/09 - Federal Communications Commission](#) [PDF File] or [\[text\]](#) - Recovery and Reinvestment Act of 2009 Broadband Initiatives. The FCC should consider the important role that small businesses play in creating a competitive, innovative telecommunications market that serves the public interest by providing more choice and lower prices; [Fact Sheet Summarizing Advocacy's Letter](#)

[Letter dated 04/13/09 - Federal Communications Commission](#) [PDF File] or [\[text\]](#) - Recovery and Reinvestment Act of 2009 Broadband Initiatives. Advocacy comments on the test for whether an applicant is a socially and economically disadvantaged small business of concern as defined under Section 8(a) of the Small Business Act; [74 Fed. Reg. 6879, \(March 12, 2009\)](#); [PDF File] or [\[text\]](#) [Fact Sheet Summarizing Advocacy's Letter](#)

[Letter dated 03/25/09 - Federal Communications Commission](#) [PDF File], or [\[text\]](#) - Rural Broadband Strategy; [GN Docket No. 09-29](#); [PDF File] or [\[text\]](#); [Fact Sheet Summarizing Advocacy's Letter](#)

[Letter dated 08/21/08 - Federal Communications Commission](#) [html], [\[text\]](#) or [\[PDF File\]](#) - OrbitCom Petition for Forbearance of Sections 61.26(b) and 61.26(c) of the Commission's Rules (WC Docket No. 08-162) [Fact Sheet Summarizing Advocacy's Letter](#)

[Letter dated 07/25/08 - Federal Communications Commission](#) [html], [\[text\]](#) or [\[PDF File\]](#) - Qwest Petitions for Forbearance Pursuant to 47 U.S.C. Section 160 (c) in the Denver, Minneapolis-St. Paul, Phoenix and Seattle Metropolitan Statistical Areas; (WC Docket No. 07-97).

[Letter dated 05/19/08 - Federal Communications Commission](#) [PDF File] or [\[text\]](#) - High-Cost Universal Service Support; Federal-State Joint Board on Universal Service ; [73 Fed. Reg. 11591, March 4, 2008](#); [PDF File] or [\[text\]](#); [Fact Sheet Summarizing Advocacy's Letter](#)

[Letter dated 04/25/08 - Federal Communications Commission](#) [html], [\[text\]](#) or [\[PDF File\]](#) - commending them for considering a proposal to grant regulatory relief to small cable providers. [Fact Sheet Summarizing Advocacy's Letter](#)

[Letter dated 03/07/08 - Federal Communications Commission](#) [PDF File], or [\[text\]](#) - Petition To Establish Procedural Requirements To Govern Proceedings for Forbearance Under Section 10 of the Communications Act of 1934, as Amended; [73 Fed. Reg. 6888 \(February 6, 2008\)](#); [PDF File] or [\[text\]](#); [Fact Sheet Summarizing Advocacy's Letter](#)

[Letter dated 03/03/08 - Federal Communications Commission](#) [PDF File], or [\[text\]](#) - Carriage of Digital Television Broadcast Signals; [73 Fed. Reg. 6099 \(February 1, 2008\)](#); [PDF File] or [\[text\]](#); [Fact Sheet Summarizing Advocacy's Letter](#)

[Letter dated 11/07/07 - Federal Communications Commission](#) [html], [\[text\]](#) or [\[PDF File\]](#) - response to industry concerns over the FCC's forbearance analysis; [WC Docket No. 06-172, August 15, 2007](#); [PDF File] or [\[text\]](#); [Fact Sheet Summarizing Advocacy's Letter](#)

[Letter dated 08/13/07 - Federal Communications Commission](#) [PDF File] or [\[text\]](#) - Petition of the Verizon Telephone Companies for Forbearance under 47 U.S.C. § 160(c) from Title II and Computer Inquiry Rules with Respect to Their Broadband Services; [WC Docket No. 04-440, \(July 30, 2007\)](#); [PDF File] or [\[text\]](#); [Fact Sheet Summarizing Advocacy's Letter](#)

[Letter dated 08/08/07 - Federal Communications Commission](#) [PDF File] or [\[text\]](#) - Parties Asked To Refresh Record in the Special Access Notice of Proposed Rulemaking; [72 Fed. Reg. 40814, \(July 25, 2007\)](#); [PDF File] or [\[text\]](#); [Fact Sheet Summarizing Advocacy's Letter](#)

[Comment dated 5/21/07 - Federal Communications Commission](#) [PDF File] or [\[text\]](#) - Request for comment on the 700 MHz auction rules; [FCC 07-72](#); [PDF File] or [\[text\]](#) [Fact Sheet Summarizing Advocacy's Letter](#).

[Letter dated 05/10/07 - Federal Communications Commission](#) [PDF File] or [\[text\]](#) - request for rulemaking on copper retirement; [Fact Sheet Summarizing Advocacy's Letter](#).

[Letter dated 03/26/07 - Federal Communications Commission](#) or [\[text\]](#) - video programming access rulemaking; [72 Fed. Reg. 9289 \(March 1, 2007\)](#) [PDF File] or [\[text\]](#). [Fact Sheet Summarizing Advocacy's Letter](#).

[Letter dated 12/7/06 - Federal Communications Commission](#) [html], [\[text\]](#) or [\[PDF File\]](#) - Service and Auction Rules for 700 MHz Wireless Spectrum Band; [WT Dkt. No. 06-150](#). [PDF File] or [\[text\]](#).

[Comment dated 10/25/06 - Federal Communications Commission](#) [PDF File] or [\[text\]](#) - Comment in addressing the "Missoula Plan," a plan filed by the National Association of Regulatory Utility Commissioners in response to the Commission's proposed rule on Developing a Unified Inter-carrier Compensation Regime; [CC Dkt. No. 01-92](#); [PDF File] or [\[text\]](#) [Fact Sheet Summarizing Advocacy's Letter](#).

[Comment dated 9/20/06 - Federal Communications Commission](#) [PDF File] or [\[text\]](#) - Comment regarding the Implementation of the Commercial Spectrum Enhancement Act and Modernization of the Commission's Competitive Bidding Rules and Procedures; [WT Dkt. No. 05-211](#); [PDF File] or [\[text\]](#) [Fact Sheet Summarizing Advocacy's Letter](#).

[Letter dated 09/18/06 - Federal Trade Commission](#) [PDF File] or [\[text\]](#) - Identity Theft Red Flags and Address Discrepancies Under the Fair and Accurate Credit Transaction Act of 2003; [71 Fed. Reg. 40785 \(July 18, 2006\)](#). [PDF File] or [\[text\]](#) [Fact Sheet Summarizing Advocacy's Letter](#).

[Letter dated 08/21/06 - Federal Communications Commission](#) [html], [\[text\]](#) or [\[PDF File\]](#) - Children's Television Obligations of Digital Television Broadcasters; [CG Dkt. No. 00-167](#); [PDF File] or [\[text\]](#) [Fact Sheet Summarizing Advocacy's Letter](#).

[Letter dated 08/08/06 - Federal Communications Commission](#) [PDF File] or [\[text\]](#) - Universal Service Contribution Methodology; [WC Dkt. No. 06-122](#); [PDF File] or [\[text\]](#) [Fact Sheet Summarizing Advocacy's Letter](#).

[Letter dated 06/15/06 - Federal Communications Commission](#) [html], [\[text\]](#) or [\[PDF File\]](#) - Letter regarding the initial regulatory flexibility analysis for application of Universal Service contributions for Internet Telephony; [CC Dkt. No. 96-45](#) [PDF File]; [WC Dkt. No. 04-36](#); [PDF File] [Fact Sheet Summarizing Advocacy's Letter](#).

[Comment dated 3/14/06 - Federal Communications Commission](#) [html], [\[text\]](#) or [\[PDF File\]](#) - Summarizing Advocacy's recommendations made at a meeting with the FCC regarding the Junk Fax Prevention Act of 2005; [CG Dkt. No. 05-338](#); [PDF File] or [\[text\]](#) [Fact Sheet Summarizing Advocacy's Letter](#).

[Comment dated 1/18/06 - Federal Communications Commission](#) [PDF File], or [\[text\]](#) - Comment regarding the Junk Fax Prevention Act of 2005; [CG Dkt. No. 05-338](#); [PDF File] or [\[text\]](#) [Fact Sheet Summarizing Advocacy's Letter](#).

[Letter dated 10/27/05 - Federal Communications Commission](#) [html], [\[text\]](#) or [\[PDF File\]](#) - Ex Parte letter regarding the FCC's Public Notice Seeking Comment Regarding Possible Revision or Elimination of Rules under the Regulatory Flexibility Act, 5 U.S.C. Section 610); [DA-05-1524](#); [PDF File] or [\[text\]](#) [Fact Sheet Summarizing Advocacy's Letter](#).

[Comment dated 8/16/05 - Federal Communications Commission](#) [PDF File] or [\[text\]](#) - Comment regarding the initial regulatory flexibility analysis for Telephone Number Portability; [CC Dkt. No. 95-116](#) [PDF File]. [Fact Sheet Summarizing Advocacy's Letter](#).

[Comment dated 7/27/05 - Federal Communications Commission](#) [PDF File] or [\[text\]](#) - Comment regarding the regulatory flexibility analysis for Special Access Rates for Price Cap Local Exchange Carriers; [WC Dkt. No. 05-25](#) [PDF File]. [Fact Sheet Summarizing Advocacy's Letter](#).

[Comment dated 5/23/05 - Federal Communications Commission](#) [PDF File] or [\[text\]](#) - Comment regarding the regulatory flexibility analysis for Developing a Unified Inter-carrier Compensation Regime; [CC Dkt. No. 01-92](#) [PDF File]. [Fact Sheet Summarizing Advocacy's Letter](#).

[Letter dated 5/17/05 - Federal Communications Commission](#) [html], [\[text\]](#) or [\[PDF File\]](#) - Ex Parte Letter supporting the Extension of the Stay of the Order regarding Rules and Regulations implementing the Telephone Consumer Protection Act (TCPA) of 1991 (also known as the "Do-Not-Call" and the "Do-Not-Fax" rule); [CG Dkt. No. 02-278, FCC 03-153](#); [PDF File] or [\[text\]](#) [Fact Sheet Summarizing Advocacy's Letter](#).

[Reply Comment dated 3/8/05 - Federal Communications Commission](#) [PDF File] or [\[text\]](#) - Comment regarding the Verizon's Petition for Forbearance from Title II and the FCC's Computer Inquiry Rules; [WC Dkt. No. 04-440](#) [PDF File]. [Fact Sheet Summarizing Advocacy's Letter](#).

[Letter dated 12/21/04 - Federal Communications Commission](#) [PDF File] or [\[text\]](#) - Ex Parte Letter regarding the regulatory flexibility analysis for Developing a Unified Inter-carrier Compensation Regime; CC Dkt. No. 01-92. [Fact Sheet Summarizing Advocacy's Letter](#).

[Reply Comments dated 12/15/04 - Federal Communications Commission](#) [PDF File] or [\[text\]](#) - Comment regarding the Initial Regulatory Flexibility Analysis for the Notice of Proposed Rulemaking in Communications Assistance for Law Enforcement Act and Broadband Access and Services; [ET Dkt. No. 04-295, FCC 04-187](#). [PDF File] or [\[text\]](#) [Fact Sheet Summarizing Advocacy's Letter](#).

[Comments dated 11/17/04 - Federal Communications Commission](#) [PDF File] or [\[text\]](#) - Comment regarding the Initial Regulatory Flexibility Analysis for the Notice of Proposed Rulemaking in Telephone Number Portability; [CC Dkt. No. 95-116, FCC 04-217](#) [PDF File] or [\[text\]](#) [Fact Sheet Summarizing Advocacy's Letter](#)

[Comments dated 10/4/04 - Federal Communications Commission](#) [PDF File] or [\[text\]](#) - Comment regarding the Initial Regulatory Flexibility Analysis for the Notice of Proposed Rulemaking in Unbundled Access to Network Elements; [WC Dkt. No. 04-313, FCC 04-179](#) [PDF File] or [\[text\]](#). [Fact Sheet Summarizing Advocacy's Letter](#).

[Comments dated 09/21/04 - Federal Communications Commission](#) - Reply Comment regarding the Initial Regulatory Flexibility Analysis for the Notice of Proposed Rulemaking in Federal-State Joint Board on Universal Service; [CC Dkt. No. 96-45, FCC 04-127](#) [PDF File] or [\[text\]](#). [Fact Sheet Summarizing Advocacy's Letter](#).

[Letter dated 9/7/04 - Federal Communications Commission](#) [html], [\[text\]](#), or [\[PDF File\]](#) - Ex Parte Letter supporting the Extension of the Stay of the Order regarding Rules and Regulations implementing the Telephone Consumer Protection Act (TCPA) of 1991 (also known as the "Do-Not-Call" and the "Do-Not-Fax" rule); [CG Dkt. No. 02-278, FCC 03-153](#) [PDF File] or [\[text\]](#). [Fact Sheet Summarizing Advocacy's Letter](#).

[Letter dated 08/24/04 - Federal Communications Commission](#) [html], [\[text\]](#), or [\[PDF File\]](#) - Ex Parte Presentation regarding the Initial Regulatory Flexibility Analysis for Local Telephone Competition and Broadband Reporting; [Docket No. 04-141, FCC 04-81](#) [PDF File] or [\[text\]](#). [Fact Sheet Summarizing Advocacy's Letter](#).

[Notice of Withdrawal - 06/10/04 - United States Court of Appeals for the District of Columbia Circuit](#) - Advocacy filed a Notice of Withdrawal of the Notice of Intent to File an Amicus Curiae Brief with the D.C. Circuit Court in a small business challenge to a Federal Communications Commission (FCC) order; [Letter dated 6/18/04](#) - from FCC Chairman Michael Powell to Stan Wise, President, National Association of Regulatory Utility Commissioners (NARUC), [Letter dated 5/06/04](#) - from FCC Chief K. Dane Snowden, Consumer & Governmental Affairs Bureau, to Stan Wise, President, NARUC. [Press Release](#)

[Comment dated 05/28/04 - Federal Communications Commission](#) - Review of Regulatory Requirements for IP-Enabled Services; [WC Dkt. No. 04-36, FCC 04-28, 68 Fed. Reg. 16193](#) [PDF File] or [\[text\]](#). [Fact Sheet Summarizing Advocacy's Letter](#)

[Comment dated 04/20/04 - Federal Trade Commission](#) - Addressing the small business impacts of the Implementation of the CAN-SPAM Act; [Project No. R411008, RIN 3084-AA96, 69 Fed. Reg. 11776](#) [PDF File] or [\[text\]](#). [Fact Sheet Summarizing Advocacy's Letter](#)

[Comment dated 03/31/04 - Federal Trade Commission](#) - Addressing the feasibility of a National Do-Not E-mail Registry under the CAN-SPAM Act; [Project No. R411008, RIN 3084-AA96, 69 Fed. Reg. 11776](#) [PDF File] or [\[text\]](#). [Fact Sheet Summarizing Advocacy's Letter](#).

[Notice of Intent to File Amicus - 02/13/04 - United States Court of Appeals for the District of Columbia Circuit](#) - Advocacy filed a notice of intent alerting the court of Advocacy's plans to file an amicus curiae ("friend of the court") brief in a small business challenge to a Federal Communications Commission (FCC) order. [Fact Sheet Summarizing Advocacy's Notice](#)..

[Reply Comment dated 02/04/04 - Federal Communications Commission](#) - Telephone Number Portability; [CC Dkt. No. 95-116, FCC 03-284 68 Fed. Reg. 68831](#) [PDF File] or [\[text\]](#). [Fact Sheet Summarizing Advocacy's Letter](#).

[Letter dated 11/21/03 - Federal Communications Commission](#) - [html], [\[text\]](#) or [\[PDF File\]](#) - Ex Parte Letter summarizing the participants' discussion at Advocacy's Roundtable regarding the Rules and Regulations implementing the Telephone Consumer Protection Act (TCPA) of 1991 (also known as the "Do-Not-Call" and the "Do-Not-Fax" rule); [CG Dkt. No. 02-278, FCC 03-153](#) [PDF File] or [\[text\]](#). [Fact Sheet Summarizing Advocacy's Letter](#)

[Notice dated 11/18/03 - Federal Communications Commission](#) - [html], [\[text\]](#) or [\[PDF File\]](#) - Ex Parte Notice of Advocacy's Roundtable regarding the Rules and Regulations implementing the Telephone Consumer Protection Act (TCPA) of 1991 (also known as the "Do-Not-Call" and the "Do-Not-Fax" rule); [CG Dkt. No. 02-278, FCC 03-153](#) [PDF File] or [\[text\]](#).

[Reply to Opposition to the Petition for Reconsideration dated 10/30/03 - Federal Communications Commission](#) [html], [\[text\]](#) or [\[PDF File\]](#) - Rules and Regulations implementing the Telephone Consumer Protection Act (TCPA) of 1991 (also known as the "Do-Not-Call" and the "Do-Not-Fax" rule); [CG Dkt. No. 02-278, FCC 03-153](#) [PDF File] or [\[text\]](#). [Fact Sheet Summarizing Advocacy's Letter](#).

[Notice dated 10/10/03 - Federal Communications Commission](#) [html], [\[text\]](#), or [\[PDF File\]](#) - Ex Parte Presentation regarding the Rules and Regulations implementing the Telephone Consumer Protection Act (TCPA) of 1991 (also known as the "Do-Not-Call" and the "Do-Not-Fax" rule); [CG Dkt. No. 02-278, FCC 03-153](#) [PDF File] or [\[text\]](#).

[Petition for Reconsideration dated 08/25/03 - Federal Communications Commission](#) [html], [\[text\]](#) or [\[PDF File\]](#) - Rules and Regulations implementing the Telephone Consumer Protection Act (TCPA) of 1991 (also known as the "Do-Not-Call" and the "Do-Not-Fax" rule); [CG Dkt. No. 02-278, FCC 03-153](#) [PDF File] or [\[text\]](#). [Fact Sheet Summarizing Advocacy's Petition](#)

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