Dear Secretary-General Gurria:

The U.S. Government took note this week of the publication by the OECD Information, Computers, and Communications Policy (ICCP) Committee’s study on broadband use and the accompanying statistics on the use of broadband services in OECD member countries. The United States supports the OECD’s efforts to reflect new technological, economic and policy developments in order to promote and encourage effective use of broadband services. However, we are concerned about the methodology on which the new statistics were based, and their failure to capture important factors, particularly their reliance on user subscriptions as the measure of broadband use. For this analysis to be sensitive to the variance in OECD members’ demographics, geography and technological trends, we believe the OECD must take into consideration, among other important factors, the remarkable non-subscriber access to broadband services achieved in the United States and in other member economies. I refer to the millions of people who are gaining access to broadband services through multiple platforms and access points. Without giving recognition to this development, we are concerned that the current OECD “subscriber statistics” standing alone fail to account for tens of millions of Americans who access and use broadband services and thereby do not reflect the state of broadband not only in the United States but also in other OECD members as well.

Allow me to offer an example. The United States has more Internet and broadband users and more Wi-Fi hot spots than any other country in the world despite larger land mass and more rural areas than most. The total number of Wi-Fi Hotspots in the United States, for example, is estimated to be about 50 thousand, many on college campuses, reflecting the fact that college communities around the United States are enjoying unbounded and unprecedented access to broadband services. As a result, the OECD analysis would seem to exclude literally millions of student age users of broadband services in the United States and presumably elsewhere because they are not “subscribers” under OECD terms. These students gain access to broadband services in a variety of geographic settings where they are not considered to be “subscribers” such as in their classrooms, dormitories, cafés, and even while they are in train stations on their way home. Nowhere is this important and growing phenomenon reflected in the OECD analyses.

Mr. Angel Gurria  
Secretary-General  
Organisation of Economic Co-operation and Development,  
Paris, France
analysis. Similarly, the OECD report apparently does not fully account for millions of
government workers who have broadband access on their desks or for the millions of
employees at large corporations. We are also witnessing the development of municipal
Wi-Fi networks that broaden public access to the Internet, a trend not currently reflected
in the OECD’s figures.

The United States strongly believes that the world community would greatly
benefit from a balanced picture of broadband deployment that accurately reflects and
captures the rich variation of how people actually gain access to broadband services, and
that provides such information in context. This point is particularly relevant because the
OECD’s analysis is designed to also benefit non-OECD members in many policy
choices. In many developing countries community centers, grid computing, and mobile
telephony access to the Internet – soon broadband access – offers huge opportunities to
leapfrog their current limitations and to participate in the global economy and in centers
of excellence. This trend requires that the OECD understand more fully the context in
which broadband services are being accessed, offered, and used and also that this
information is reflected in the statistical analysis.

I bring this issue to your attention as it is important to the continuing relevance of
the OECD’s work in the rapidly evolving information society of which we are all a part.
Moreover, apart from these important broadband access and use issues, the United States
is submitting a contribution to the OECD on the ICCP Broadband Study detailing three
other elements critical to the totality of the OECD’s examination of broadband
penetration and use rates. We intend to ensure that these perspectives are not lost as we
embark on the preparations for the 2008 OECD Ministerial on the “The Future of the
Internet Economy” to be held in Korea in 2008. We look forward to working with the
OECD to broaden the scope of review of this important topic.

Sincerely,

[Signature]

Ambassador David A. Gross
United States Coordinator
International Communications and Information Policy

cc: Aart Jan de Gues, OECD Deputy Secretary General
Nobuo Tanaka, OECD Director for Science, Technology and Industry
Constance Morella, U.S. Ambassador to the OECD