October 5, 2019

**Ex Parte**

Ms. Marlene H. Dortch

Secretary

Federal Communications Commission

445 Twelfth Street, S.W.

Washington, D.C. 20554

**Re: Modernizing the FCC Form 477 Data Program, WC Docket No. 11-10; Connect America Fund, WC Docket No. 10-90**

Dear Ms. Dortch:

Americans are consuming more content over the internet today than ever before, therefore one very important question remains: ***Where is broadband service available and where is it not?***

In August 2019, USTelecom released a report detailing the results of two pilot programs conducted in support of its Broadband Mapping Initiative. In the attached transcript my colleague, Jess Peterson, interviews Federal Communications Commissioner Brendan Carr to discuss the USTelecom pilot program results and the importance of updating the FCC’s broadband mapping rules.

Mr. Peterson and Commissioner Carr cover the following topics:

* The Rural Digital Opportunity Fund that takes effect in 2020
* USTelecom’s Broadband Mapping Initiative and report on the pilot program findings
* Why GPS technology isn’t sufficient for locating unserved structures
* 5G network evolution in rural areas

As increased network speeds and 5G becomes a reality for many Americans, the digital divide in rural communities must be prioritized. USTelecom suggests that the **Broadband Serviceable Location Fabric** **(BSLF or Fabric) technology** that was outlined in initial filings regarding the Broadband Mapping Initiative will produce more accurate and granular mapping for broadband deployment. Subsequent filings regarding results of the two pilot programs provide clear evidence that the “fabric” map is the way to go. This new technology will ensure that rural Americans are not left behind as the rest of the country launches into the next generation of innovation and connectivity.

Respectfully,

A close up of a logo

Description automatically generated

Jack Alexander

President, Rural Agriculture Council of America

September 20, 2019

|  |
| --- |
| **Jess Peterson**  Mr. Carr. [crosstalk]. |
| **Commissioner Brendan Carr**  Hey, man, how's it going? |
| **Jess Peterson**  We're doing a podcast. I mean, you told me. When you were on your phone on a horse, you said, "Peterson, we can make this easy." So I'm trying out a podcast.  **Commissioner Brendan Carr** |
| Yeah, I know. I know, yeah. And I'm glad we're talking about mapping. Oh man, I can't get a single bar out here. No service. I don't have 2G, [let alone?] 3G. I pull up my phone, and I FaceTime my wife in 4G LTE from the middle of Jess's land, so we have solved this problem [laughter]. |
| **Jess Peterson**  That's it. And if you've got-- you only have how many more states left on your tour? So if you just go to every state and every dead spot, it brings connectivity there. So we've only got 422,000 more horseback rides for you to do, and we'll be fine. |
| **Commissioner Brendan Carr**  Yeah. We're up to 33 states at this point, so I just got 17 left. |
| **Jess Peterson**  I love it. I love it. Well, hey, sounding good on your end. I'll do a little back and forth here, and then we'll jump right in. But, yeah, are you guys good on your end?  **Commissioner Brendan Carr** |
| No, we'll go with this then.  **Jess Peterson** |
| Okay. All right. No, we're coming in loud and clear. I actually, oddly enough, had to move to be right next to the router because my Wi-Fi had to be on, and so hopefully I don't click out here. So if at any point I start distorting, Evan can kick me a note via email or just let me know. So coming in loud and clear right now?  **Commissioner Brendan Carr** |
| Yeah, sounds good.  **Jess Peterson** |
| Outstanding. Outstanding. How we doing? Can you hear me okay now?  **Commissioner Brendan Carr** |
| I got you back now, yeah. |
| **Jess Peterson**  Okay. All right. Perfect. All right. Let's do this. I'll start at the top here then. Yes. Okay. Hold on just a sec. |
| Well, hey, Commissioner Carr we're heading back out actually this weekend to work on the-- to work cattle on that same pasture out this spring. So those cattle have separated. They've traveled all over the area. I wish I had you back to get you back in the saddle and help us out.  **Commissioner Brendan Carr** |
| Yeah, absolutely. I'd love to get back out there. I had a great ride with you, and thanks for the chance to chat with you today.  **Jess Peterson** |
| Yeah. No, absolutely. And you truly are a rural champion. In fact, all of your colleagues there in the FCC are doing an outstanding job. You've got the FCC Connect America Fund, which has been incredible. And then you've also got this Rural Digital Opportunity Fund. You guys are shooting to connect $20 billion-- putting $20 billion into reaching out to these unserved areas. That's impressive, and you've been championing that to get that done.  **Commissioner Brendan Carr** |
| Yeah. We're really lucky right now at the FCC. We've got all five commissioners that are very focused on closing the digital divide. And for my part, I think there's no better way to see that divide and to learn how to close it than getting out of DC. And to your point, I've made an effort to get out of the city as often as possible and have been in 33 states now in this job, and it's really informed the decisions we make back in DC. There's usually so many layers of lawyers and lobbyists before people get to talk to government representatives, so it's great to get out there and hear directly from the communities.  **Jess Peterson** |
| Yeah. I certainly think it's had a very positive impact. We can't appreciate you enough. USTelecom recently completed a pilot project. This was conducted in rural Virginia and Missouri, and what they talked about was the ability to reach this connectivity and to expand the access. But however, they found a margin of error upwards of 38% with the current federal methodology, and basically, as you know from traveling these rural areas, the mailbox that may be on the map for your mapping site is not the most accurate way. It still doesn't get you to your site's specific location, whether it's your ranch or the actual home where you need that connectivity. So if we're laying out wire, we're not going far enough to the actual location. So ideas such as geocoding technology and really upgrading the ability and how we use this mapping-- basic GPS isn't getting the job done. So that's what that study has shown just in those two states alone, Missouri and rural Virginia. So again, knowing the commission is very focused on that, what can we do or what methodology do you see that we can upgrade, again, utilizing this geocoding technology and what not and not just relying on GPS? What are your thoughts on that?  **Commissioner Brendan Carr** |
| Well, I think you're exactly right. And when you think about closing the digital divide, making sure every single community in the country gets next-gen connectivity, you don't necessarily think about maps right off the bat. And if you do, you don't really think that there should be fundamental problems with the maps, but yet it's both important and it's one where we have some issues with the maps. The maps are what we use to drive billions of dollars of federal funds, and if we're not putting those funds into the right communities, you're not going to be seeing very good results. And quite frankly, the mapping process that the FCC uses today, or has used, has been in place for a long time, since perhaps as early as the early 2000s. And when we put that approach in place, it was designed to do an entirely different purpose. I mean, this was a point in time when less than half the Americans had internet access at home. |
| And over the years - it tends to be the case in DC - we have taken some nibbles around the edges. We've effectively added a Christmas ornament to the mapping approach here, we've put new fender on the Pinto there, and we've never stepped back and gone to first principles and said, "Okay. Is this current approach still fit for purpose?" We've now done that, and we think that it isn't fit for purpose anymore. To your point, it's not driving granular enough, accurate enough info about people that have broadband and those that don't. So we're basically turning the page on that old approach, and we're now heading down a much more granular approach. USTelecom, other providers have been very beneficial in the work they're doing with pointing us towards a better path to getting accurate maps.  **Jess Peterson** |
| And so you're saying this geocoding technology is going to be a little bit more effective or focused versus the GPS side of technology and usage. |
| **Commissioner Brendan Carr**  Yeah, we're moving to what we call a digital opportunity data collection. It's going to be a much more granular requirement of data from carriers. So again, before, we would basically look at a census block, and if one person was served in the census block, or really if one person could be served within a census block within a reasonable period of time, we'd consider the entire census block to be served. So, more than that, we're also going to be relying and seeking comment, at least, on using crowdsourcing and other location information. Today, a lot of consumers have apps right on their phones, in the wireless context, at least, where you push a button through Ookla and other apps, and it gives you an exact readout on your phone of speed. So we're looking at how do we leverage those types of commercial third-party approaches, whether on the wireless side or the wireline side, to get us more accurate feedback.  **Jess Peterson** |
| If all of Washington worked as hard as you and your fellow commissioners did, we wouldn't have the problems that we're having right now. So we greatly appreciate your, obviously, awareness and working on this issue. And so, from your perspective, you're aware that those lines, if they get to the mailbox, that still might be another mile or two into the ranch. So well aware of that complexity, and then just working with the best providers that are out there to be able to reach and actually know that mapping location for the location of addresses. Certainly a priority, it sounds like, from your perspective.  **Commissioner Brendan Carr** |
| Yeah. Absolutely. I was, a couple of months ago, out in Forsyth, Montana, and many, many miles down a dirt road and with the telecom crew that was trenching in fiber to homes spread out across this area. Some homes were right up against the dirt road. To your point, others can be a mile back. And those differences can result in significant changes to the cost of building out and, therefore, the required support from the federal government, so we need to keep all of that front of mind. |
| **Jess Peterson**  Outstanding. And again, just those travels, those rural travels you do, are so incredible. And something I'll just tell you, from spending a lot of time in Washington, DC, splitting time between Washington, DC, and Billings, Montana, it's really interesting to get plugged into the communities. I was listening, the other day, to the St. Vincent's Healthcare system and them giving an update, and the telehealth priorities that you have outlined are extremely incredible. And everyone is so appreciative. [But?] there's really this alignment, this agreement, where folks are looking to see more, to keep that moving forward. So, as folks are listening to this, what more can they do? Is it important to keep that conversation going with their county commissioners, with their elected officials, with their members of Congress? How can they help? Because every time I turn around, I talk about what the commission is doing and their commitment, and folks turn around and say, "Hey, they're doing a great job. What more can we do?" Is there any thoughts or reflections you have for folks that are listening in to say, "Hey, I want to get involved. This sounds incredible. What can we do to be useful and helpful?"  **Commissioner Brendan Carr** |
| Yeah. Absolutely. We could use a lot of support there. And picking up your point about telehealth, I think that's one of the great upsides to increased connectivity. A couple of weeks ago, I was in South Dakota, in the Pine Ridge Indian Reservation. This is an area that is the size of Rhode Island and Delaware combined, with a population that's about 100 times smaller, very remote, very rural. Went to an Indian Health Services hospital there, and thanks to a broadband connection to that facility, they're able to have high-definition video connections to world-class doctors located in big cities around the country. So you can have, virtually, through a virtual connection, quality of care that otherwise is many, many miles, a many-hour drive away or just simply unavailable. |
| So I think there's a lot of roles that people can play to make it clear to their local elected officials, "We want next-generation infrastructure. We want small cells. We want more fiber." And local governments can be forward leaning, in terms of attracting those investments, by updating their regulatory approach to broadband. And we're seeing communities around the country do that, and when they do, they're on the leading edge of build. I was in Sioux Falls, South Dakota, with the mayor, and he updated his permitting approach to be more friendly to 5G, and now they've been announced as entering into a contract to build out that 5G infrastructure. In fact, 13 cities in the US got 5G last year. We have about 33 cities right now, and we'll have over 40 at the end of the year. And so local regulations really make a difference as to whether you attract that investment and therefore all of the benefits for your community, or whether you don't.  **Jess Peterson** |
| Okay. Perfect. All right. Well, I just want to comment on the fact, Commissioner, exactly what you said. When we're working with communities, oftentimes, you think it's a far-reaching solution when reality is the solution's in your backyard. It's with their city councils. It's with their county commissioner. It's with their mayor. So oftentimes, for folks to get national, i.e., national connectivity, you got to get local. And I think that really needs to be emphasized through this process. Folks keep coming up to me saying, "Jess, I want all this telehealth, educational, business purposes, for our ranch, for our farm. Internet is so useful. Connectivity is so useful." Great. Mention it to your county commissioner. Mention it to your city council. Mention it to your local elected official. And so, Commissioner, you've done an outstanding job in this. Thank you for continuing to travel. We're going to head out later this afternoon and get back to those cattle that you took a ride with us, and so thanks again for all you're doing to champion it. Obviously, this mapping thing is front and center in your mind, and obviously, some common-sense solutions are crossing the Potomac River every time you make a trip to rural America. So thank you. Keep it going. My best to you and your colleagues, and we'll hope to get you out West here again sometime soon. Keep up, keep [cowboying?] up there for connectivity. |
| **Commissioner Brendan Carr**  Well, thank you for all your work on these issues. I can't tell you how important is, to your point, not just at the local level, but the voices matter. And I was introduced to a number of county commissioners by spending time with you, Jess. And their letters, their filings to the FCC, really did help build and make the case for reforms at the federal level, and we need to keep up the work at the state and local level. And really, the keys are twofold, one, reasonable permitting fees that let cities recover their costs but otherwise incentivize build, and reasonable shot clock so that we can get decisions made on a timely basis. And by championing those at the state and local level, that'll help put your community front and center for 5G.  **Jess Peterson** |
| Outstanding. There you have it, folks. That's the simple way to cowboy up with connectivity, with Commissioner Brendan Carr. We appreciate him. We appreciate all the FCC commissioners and everything they're doing. We'll sign off now, and a big thanks to everyone and stay involved. |
| All right. Hey, thanks for all the [inaudible]. I'll let you get on your next meeting. Thanks so much, Brendan. Appreciate your time, as always. Have a great weekend, and hopefully, we'll be in touch. |
| **Commissioner Brendan Carr**  Thanks so much. Talk to you soon. |
| **Jess Peterson**  Talk to you [crosstalk]. |
| Bye. |