

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Establishing the Digital Opportunity Data)	WC Docket No. 19-195
Collection)	
)	
Modernizing the FCC Form 477 Data)	WC Docket No. 11-10
Program)	

**REPLY COMMENTS
OF
GVNW CONSULTING, INC.**

October 7, 2019

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I. INTRODUCTION

GVNW Consulting, Inc. (“GVNW”) submits these reply comments to address comments filed in response to the Federal Communications Commission (“FCC”) request for comments relating to Digital Opportunity Data Collection to enhance the accuracy and usefulness of broadband deployment reporting as set forth in a Second Notice Of Proposed Rulemaking in the above-captioned docket.¹

A review of the comments filed in response to the Commission’s request shows that there is support in the record for the Commission to enhance the accuracy and usefulness of broadband deployment by setting common technical standards for carriers to base their reporting. Further, that there is support for the establishment of a challenge process that allows carriers to dispute another carriers reported data before that information could be used to impact the high cost support that carriers receive. The record also indicates that there is support for the use of crowdsourcing

¹ *Establishing the Digital Opportunity Data Collection*, WC Docket No. 19-195, *Modernizing the FCC Form 477 Data Program*, WC Docket No. 11-10, Report and Order and Second Further Notice of Proposed Rulemaking, FCC 19-79 (rel. Aug. 6, 2019).

information but that there is some concern amongst the commenters regarding the potential for the public feedback to be inaccurate, so caution must be used with such crowdsourced information.

II. DISCUSSION

A. Some Parties Agree that Common Technical Standards Are Needed To Ensure Accurate Reporting Of Broadband Service To Customer Locations.

The Digital Opportunity Data Collection will help to enhance the accuracy and usefulness of broadband deployment reporting relating to the broadband services that carriers provide to customers, the speed of the broadband services offered, and the locations that a carrier can currently provide broadband service. However, in order to ensure the accuracy of the data reported by carriers, some commenters agree that the FCC needs to set common technical standards so that carriers can base their reporting upon the technical standards that will help to ensure that the information reported is accurate.

About the common technical standards needed, NTCA commented, “Specifically, the Commission should require all reporting parties to incorporate certain standardized technical assumptions with respect to the technologies used to make service available to consumers.”² NTCA went on to provide some examples of the types of technical standards that can be established based upon the type of technology the provider uses to deploy their broadband services. Similarly, Connected Nation urged the Commission to take action to establish “technical standards for the creation of coverage polygons” that will be reported.³ By establishing set technical standards that carriers can use prior to their reporting of their polygon-data for coverage of

² Comments of NTCA – The Rural Broadband Association, WC Docket No. 19-195; WC Docket No. 11-10 (filed September 23, 2019), (“NTCA”), p. 3.

³ Connected Nation, WC Docket No. 19-195; WC Docket No. 11-10 (filed September 23, 2019), p. 2.

broadband service, the FCC will help to ensure that more accurate data about broadband coverage is obtained from all carriers.

B. Some Parties Agree That A Challenge Process Is Needed To Ensure Accuracy And Verification.

A challenge process to the Digital Opportunity Data Collection will provide a necessary check and verification of the accuracy of broadband service reported by a carrier. It is important to validate accuracy before any decision on the reduction of high cost support is made to the service area of any carrier. Some parties agree that a challenge process would be a necessary component to the data collection reporting. For example, NTCA commented, “while certain ‘upfront’ steps must be taken to ensure the accuracy and consistency of data reported in the first instance by providers . . . a ‘back-end’ refinement – via a robust challenge validation process – is essential as well to ensure that the data is as accurate and current as possible prior to making any policy or funding decisions.”⁴

WTA also expressed the need for a challenge process, “despite best efforts to collect more granular data, virtually all data is subject to errors, either deliberate or negligent. To minimize this problem, the Commission must institute a regularly occurring challenge process that can be used to verify the data.”⁵

⁴ Comments of NTCA, pp. 5-6.

⁵ Comments of WTA – Advocates of Rural Broadband, WC Docket No. 19-195; WC Docket No. 11-10 (filed September 23, 2019), (“WTA”), p. i.

C. Crowdsourced Feedback Can Be Helpful But The Commission Should Use Caution In Using This Information.

Some commenters note that crowdsourcing can provide good feedback regarding the ability or inability of carriers to provide broadband service in an area but also caution the FCC on the use of this type of public feedback. About crowdsourced information NTCA commented, “[T]he Commission’s use of crowdsourced data – while a valuable tool – must be informed by its limitations. Broadband service as experienced by the consumer can be often be influenced by modems, routers, and other consumer-installed customer premises equipment.”⁶ Likewise, WTA expressed the following concerns regarding the use of crowdsourced information: “There are a number of reasons, usually out of an RLEC’s control, that could explain a customer not receiving the speed and latency measurements they’re expecting. As such, WTA believes that crowdsourced information should be used to identify potential problems and inaccuracies, but not to resolve them.”⁷ In addition, Verizon also expressed using caution with the use of crowdsourced information: “Such public input from actual broadband customers and potential customers can improve the accuracy of the coverage maps or identify inadvertent errors. But opening the process to public data can also introduce noise and complexity – whether from well-meaning or from mal-intentioned individuals or entities – that can be extremely difficult to separate from useful submissions.”⁸

With the possibility of either inaccurate public information or intentional bad faith public information of a carrier’s reported broadband service data, it is important that the FCC exercise caution when using this information. Moreover, due to the potential for inaccurate or mal-intentioned public information, the FCC should establish a process for a carrier to respond to a

⁶ Comments of NTCA, p. 11.

⁷ Comments of WTA, p. i.

⁸ Comments of Verizon, WC Docket No. 19-195; WC Docket No. 11-10 (filed September 23, 2019), p.5.

dispute if it chooses to do so to provide evidence of its ability to provide the broadband service as reported.

III. CONCLUSION

For the reasons set forth herein, GVNW supports the FCC's efforts to enhance the accuracy and usefulness of broadband deployment reporting and the identification of locations that have and do not have broadband service using a polygon-based data format. GVNW believes that there is support in the record for the information that is collected and reported to be based on set common technical standards so that it is accurate. Further, that there is support in the record for the collected information to be subject to a validation or challenge process to ensure its accuracy. Lastly, GVNW believes that the record indicates that crowdsourcing information can provide valuable input but that caution should be used when using such public information.

Respectfully submitted,
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