

In the Matter of )  
 )  
Modernizing the FCC Form 477 ) WC Docket No. 11-10  
Data Program )

## COMMENTS OF COMCAST CORPORATION

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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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**COMMENTS OF COMCAST CORPORATION**

Comcast Corporation (“Comcast”) hereby submits these comments in response to the Further Notice of Proposed Rulemaking released by the Federal Communications Commission (“FCC” or “Commission”) in the above-captioned proceeding.<sup>1</sup>

**I. INTRODUCTION AND SUMMARY**

Comcast strongly supports the Commission’s goal of ensuring that the Form 477 submissions provide useful data about the state of communications deployment, particularly broadband deployment. As the Further Notice indicates, “[a]ccurate and reliable data . . . are critical to the Commission’s ability to . . . [engage in] decision-making based on sound and rigorous data analysis.”<sup>2</sup> In considering updates to Form 477, however, Comcast urges the Commission to be mindful of its parallel objective of “identifying and eliminating unnecessary or overly burdensome filing requirements.”<sup>3</sup> Indeed, throughout the course of developing and modifying the Form 477 filing

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<sup>1</sup> *Modernizing the FCC Form 477 Data Program*, Further Notice of Proposed Rulemaking, 32 FCC Rcd 6329 (2017) (FCC 17-103) (“FNPRM” or “Further Notice”).

<sup>2</sup> *Id.* ¶ 6.

<sup>3</sup> *Id.* ¶ 1; *see also id.* ¶ 5 (“From the outset, the Commission sought to minimize the burden the collection’s requirements would impose on filers.”).

requirements, the Commission has sought to fulfill both aims by “tak[ing] measures to reduce burdens while improving the quality of [its] data.”<sup>4</sup>

Consistent with these sensible, dual objectives, the Commission should avoid adopting new reporting obligations that would provide little, if any, new insight into the state of broadband deployment, but, nonetheless, would impose significant additional administrative burdens on providers and/or the Commission. In particular, the Commission should not require providers to:

- Submit Wi-Fi deployment data as a proxy for mobile broadband deployment, because (a) Wi-Fi provides portable – *not* mobile – connectivity, (b) Wi-Fi hotspots generally rely on wireline broadband facilities that *already* are reported on Form 477, and (c) Wi-Fi cannot be converted into a mobile service.
- Report service area categories for each technology code proposed in the Further Notice, because employing those categories likely would entail substantial new burdens but not provide the Commission with any additional information about the deployment of broadband services by Comcast and companies that operate similarly-designed networks;
- Submit geospatial data or identify census blocks that can be fully served, because the limited additional information that those requirements might produce would be far outweighed by the economic costs and other burdens that service providers would be forced to incur; or
- Report “committed information rate” or other speed data for business, enterprise, or government services, because, as acknowledged in its own statements, there is no indication that the Commission needs this data.

Moreover, requiring providers to collect broadband data at the service address level would be particularly onerous and potentially could lead to the submission of an additional tens of millions of rows of data. If the Commission ultimately decided to require the use of a service level approach, it should limit that obligation to rural areas

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<sup>4</sup> *Modernizing the FCC Form 477 Data Program*, Report and Order, 28 FCC Rcd 9887, ¶ 4 (2013) (“2013 477 Order”).

and change the Form 477 filing requirement to an annual obligation. That approach would provide the Commission with granular information about the state of broadband service in areas where deployment is more likely to have fallen short of the agency’s goal of universal access, while significantly easing the compliance burdens imposed on service providers and substantially reducing the volume of information that the Commission would have to process.

## **II. THE COMMISSION SHOULD NOT MODIFY FORM 477 TO REQUIRE PROVIDERS TO SUBMIT WI-FI DEPLOYMENT DATA**

The Commission seeks comment on whether and how the Form 477 should be modified to include information about the deployment of “facilities used in non-traditional ways in offering wireless services to consumers.”<sup>5</sup> In particular, the Commission asks whether it should track the utilization of Wi-Fi facilities when they are “offered to consumers in conjunction with resold mobile service.”<sup>6</sup> We respectfully submit that it should not.

Comcast offers resold mobile wireless service to consumers under the XFINITY<sup>®</sup> Mobile brand. Subscribers to this mobile service also obtain access to the millions of Wi-Fi hotspots that Comcast has deployed nationwide throughout its cable footprint. Subscribers to Comcast’s wireline broadband XFINITY<sup>®</sup> Internet access service similarly obtain access to those Wi-Fi hotspots. As discussed below, the fact that access to Comcast’s Wi-Fi hotspots is marketed as part of a service bundle with XFINITY<sup>®</sup> Mobile does not make the Wi-Fi hotspots a form of, or proxy for, mobile

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<sup>5</sup> FNPRM ¶ 15.

<sup>6</sup> *Id.*

broadband service. Comcast's Wi-Fi hotspots: (1) provide access to the company's wireline broadband Internet access service; (2) in the vast majority of cases are provided over wireline broadband facilities that already are reported on Form 477; and (3) cannot be converted from a portable to a mobile service. Consequently, tracking the locations of these hotspots would merely impose substantial new costs and burdens on providers and would shed no new light on either the deployment of mobile wireless broadband technologies or where mobile broadband services are "affirmatively available to American consumers."<sup>7</sup>

***Comcast's Wi-Fi Hotspots Provide Access to Its Wireline Broadband Internet Access Service.*** As the Further Notice correctly recognizes, Wi-Fi hotspots provide consumers with portable, not mobile, wireless connectivity.<sup>8</sup> Nevertheless, by asking whether to track deployment of Wi-Fi facilities offered "in conjunction with" resold mobile service, the Commission appears to imply that Wi-Fi should also be regarded as some form of a mobile offering.<sup>9</sup> Contrary to this implication, XFINITY<sup>®</sup> Mobile service and access to Comcast's Wi-Fi hotspots are distinct products: The former offers subscribers access to a wireless network that supports mobile communications, while the latter offers subscribers access to Comcast's wireline network.<sup>10</sup> The fact that Comcast

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<sup>7</sup> *Id.* ¶ 22 (proposing to eliminate the requirement to submit certain mobile data that are "not producing accurate information about where services are affirmatively available to American consumers").

<sup>8</sup> *Id.* ¶ 15.

<sup>9</sup> *Id.*

<sup>10</sup> In particular, Comcast's Wi-Fi hotspots provide connectivity to the Internet by creating "offload" points for all of its customers, including XFINITY<sup>®</sup> Mobile customers,

markets them together does not somehow render access to the Wi-Fi hotspots a mobile product. In fact, Comcast began offering access to its Wi-Fi hotspots long before it launched its XFINITY<sup>®</sup> Mobile service as a Mobile Virtual Network Operator (“MVNO”) and continues to provide wireline customers with access to its Wi-Fi hotspots, a fact that further underscores the separate nature of Comcast’s Wi-Fi hotspot product.

***Wi-Fi Hotspot Facilities Already Are Reported on Form 477.*** The overwhelming majority of Comcast’s Wi-Fi hotspots are located in residences and small business locations that subscribe to Comcast high-speed wireline Internet access. Since Comcast already reports its deployment of these wireline facilities on Form 477, tracking the locations of the Wi-Fi hotspots would provide no incremental insight into the deployment of broadband technologies.<sup>11</sup> In fact, the same customer premises equipment that provides Wi-Fi access for the residential or small business customer also provides the hotspot access service for guests or visitors.<sup>12</sup>

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who already subscribe to the company’s high-speed Internet access service. The utilization of Wi-Fi hotspots does not create a distinct mobile broadband service.

<sup>11</sup> A very small percentage of Comcast’s hotspots are located outdoors or at other locations outside of homes and businesses. These hotspots provide Internet access through dedicated wireline Comcast circuits that connect the locations to the company’s high-speed wireline network. Because almost all of these hotspots are located within Comcast’s wireline footprint, they also are included in the wireline deployment information that Comcast already provides on Form 477.

<sup>12</sup> Moreover, to the extent that the new proposed report would require the submission of information at the “service address” level, we describe below the substantial burden of complying with such an obligation without, in the case of Wi-Fi reporting, any useful addition to the Commission’s understanding of the state of broadband deployment. See discussion *infra* at Section IV.

***Wi-Fi Hotspots Cannot Be Converted Into a Mobile Service.*** The Commission also asks whether numerous Wi-Fi hotspots could somehow be integrated in a way that would transform Wi-Fi from a feature on a wireline platform to a mobile wireless service that, therefore, should be “tracked” as part of the Form 477 submission.<sup>13</sup> As discussed above, merely marketing access to Wi-Fi hotspots in conjunction with licensed CMRS services does not create a new mobile service that should be separately tracked in the Form 477. Comcast’s XFINITY<sup>®</sup> Mobile provides wireless mobile service through an MVNO arrangement while also enabling subscribers to automatically connect to XFINITY-branded Wi-Fi access points. But, the access to XFINITY<sup>®</sup> Wi-Fi is no different than the access all XFINITY<sup>®</sup> Internet customers have, regardless of their wireless providers. Customer utilization of unlicensed Wi-Fi access points in conjunction with licensed wireless service is quite common and does not create some new, “non-traditional way[] in offering wireless services to consumers.”<sup>14</sup> The Wi-Fi access points do not provide a separate mobile wireless service.<sup>15</sup> Rather, they provide portable access to a wired network and that deployment information already is captured in the Form 477.

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<sup>13</sup> FNPRM ¶ 15 (“Might there develop other wireless services based exclusively on the integration of numerous unlicensed facilities, such as Wi-Fi routers, that might warrant tracking in Form 477?”).

<sup>14</sup> *Id.*

<sup>15</sup> See Letter from David Don, Vice President, Comcast Corporation to Marlene H. Dortch, Secretary, Federal Communications Commission, WT Docket No. 17-69 (Sept. 15, 2017) (providing a more detailed description of how XFINITY<sup>®</sup> Mobile uses the separate cellular and Wi-Fi networks).



Moreover, the unlicensed Wi-Fi facilities located in homes along a residential street generally have an extremely limited reach. For example, those radios would not have the signal strength to reach automobiles traveling down that street. Further, even if hotspot signals did reach a particular street, motorists would find their wireless service interrupted each time they exited a hotspot because of the gaps between hotspots. Finally, if there were instances where Wi-Fi hotspots overlapped, Wi-Fi technology, unlike the cellular technology used for mobile wireless networks, is not designed to permit the seamless hand-off of a call from one hotspot to another.

In short, tracking Comcast's Wi-Fi hotspots on Form 477 would not provide the Commission with additional information about mobile broadband deployment because the company's Wi-Fi service is not a mobile broadband service. Rather, Comcast's Wi-Fi offering is a feature of the company's wireline broadband service, which is already reported on Form 477.

### **III. THE COMMISSION SHOULD NOT REQUIRE FIXED BROADBAND PROVIDERS TO REPORT SERVICE AREA CATEGORIES FOR EACH TECHNOLOGY CODE**

The Commission should not "require fixed broadband providers to indicate whether total customers served on a particular technology could be increased in each census block listed when they report deployment data."<sup>16</sup> The Commission specifically seeks comment on:

[W]hether all fixed broadband providers should be required to identify on Form 477 three categories of service areas for each technology code: (1) areas where there are both existing customers served by a particular last-mile technology, and total number of

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<sup>16</sup> FNPRM ¶ 34.

customers using that technology can, and would, be readily increased within a standard interval upon request; (2) areas where existing customers are served but no net-additional customers using that technology will be accommodated; and (3) areas where there are no existing customers for a particular technology but new customers will be added within a standard interval upon request.<sup>17</sup>

As explained below, the distinctions proposed by the Commission among the categories are not meaningful in Comcast's case, presumably would not be meaningful for other cable operators, would not provide the Commission with additional information about the deployment of broadband facilities by Comcast and similarly-situated companies, and yet would be extremely burdensome to produce.

Comcast provides wireline broadband Internet access connections that are reported on Form 477 to residential and commercial customers through two technologies: (1) hybrid fiber-coaxial ("HFC") technology that is used primarily to serve residential and small business customers; and (2) "all-fiber" technology that is used to provide very high-speed Internet access to enterprise and a limited number of residential customers.

With respect to its HFC-based offerings, Comcast can provide high-speed Internet access service using this technology to virtually any consumer located within the company's footprint who has access to Comcast's cable service. As a result, Comcast is not aware of any census blocks where it currently provides HFC-based Internet access service to consumers, but is unable to serve a single additional consumer. Comcast also is not aware of any census blocks where it has deployed the capability to provide HFC-based Internet access, but currently has no subscribers. If the Commission were nevertheless to adopt the proposed reporting requirements (which it should not), Comcast

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<sup>17</sup> *Id.*

would be required to expend substantial resources to verify that its HFC-based offerings do not serve any areas that would be covered by categories (2) and (3) quoted above.<sup>18</sup>

With respect to Comcast’s “all-fiber”-based product, there is no viable mechanism, short of physically examining individual locations, to determine whether Comcast is able, as a practical and commercial matter, to serve a particular site. Rather, Comcast must incur the costs of a technician performing a site and route review of each location where the “all-fiber”-based service has been requested to determine whether such service is practically and commercially feasible. Such a site inspection would disclose, for example, whether there are impediments (*e.g.*, a utility right-of-way or a natural barrier, such as a waterway) that would make construction impractical. In other words, Comcast would have no credible basis for deciding whether a particular area currently served by its “all-fiber”-based offering would be eligible for inclusion in any of the three categories the Commission identifies absent a location-by-location review. Since Comcast’s network passes tens of millions of customer locations, the cost of conducting such an on-site, location-by-location review would quickly become prohibitive – and, again, for little, if any, new insight into the Commission’s measurement of broadband deployment.

Thus, with respect to “all-fiber”-based services, it would not be reasonable for the Commission to “assume that fixed broadband providers are aware of whether they have the capacity in place to make their service available and add new subscribers in a particular location.” Nor will “new software development” change this situation, given

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<sup>18</sup> See FNPRM ¶ 34. The areas identified in Comcast’s current Form 477 all fall into category (1).

the need for on-site inspections to determine whether each potential new location can be served.<sup>19</sup>

In short, the costs and burdens of requiring wireline and other fixed broadband providers to report whether total customers served on a particular technology could be increased in each listed census block would far outweigh any putative benefits or new insight regarding broadband deployment. Accordingly, the Commission should not adopt these new requirements.

#### **IV. THE COMMISSION SHOULD CAREFULLY CONSIDER AND WORK TO MINIMIZE THE BURDENS SERVICE PROVIDERS WOULD FACE IN SUBMITTING MORE GRANULAR DATA**

The Commission also seeks comment on a number of options for obtaining more granular information about broadband deployment, including: (1) “giving fixed-broadband providers the option of reporting their deployment data by filing geospatial data showing coverage areas”;<sup>20</sup> (2) requiring broadband providers to identify census blocks that they can fully serve and then potentially provide geocoded deployment data for blocks that are not fully covered;<sup>21</sup> and (3) collecting data at a sub-census block level, such as by service address.<sup>22</sup> As explained below, the first two of these alternatives should not be required, as they would impose significant, additional compliance burdens while providing the Commission with little, if any, supplemental information about broadband penetration. And while the third alternative could produce useful

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<sup>19</sup> FNPRM ¶ 35.

<sup>20</sup> *Id.* ¶ 38.

<sup>21</sup> *Id.* ¶ 43.

<sup>22</sup> *Id.* ¶¶ 39-42.

supplementary information, it would need to be implemented in a way that does not impose unnecessary new costs and burdens on providers or the Commission.

***Geospatial Data.*** The Commission should not mandate that wireline broadband providers report their deployment information using geospatial data to show coverage areas. Although Comcast does not oppose giving providers the *option* of submitting data in this format, the Commission correctly observes in the Further Notice that “knowing the areas served does not provide information about the location or number of homes that have or lack service (*i.e.*, it provides information on the areas that have or lack service, not the homes that lack service).”<sup>23</sup> Moreover, as explained below, the costs that Comcast and other providers would incur to comply with a geospatial data filing requirement would be substantial. The Commission, therefore, should conclude that those costs outweigh the concededly limited benefits that the additional filing obligation would produce.

The Commission previously has noted that it is not burdensome for mobile broadband providers to submit geospatial data because they maintain this information, *inter alia*, for “radio frequency network design” and to publish coverage maps.<sup>24</sup> In contrast, Comcast and likely other wireline broadband providers do not develop and maintain geospatial data concerning their high-speed facilities in the ordinary course of business. If required to do so, Comcast would need to contract with a third-party

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<sup>23</sup> *Id.* ¶ 38.

<sup>24</sup> 2013 477 Order ¶¶ 48-49.

geocode provider,<sup>25</sup> and Comcast currently estimates that the cost of producing the necessary geospatial data for each filing is likely to exceed one million dollars.

Moreover, if required to use polygons to depict a network's coverage as mobile providers do today, wireline broadband providers would need to ensure that the polygons do not overlap.<sup>26</sup> That would be an onerous process because, for example, a provider would have to combine locations that subscribe to identical transmission speeds into groups of non-overlapping polygons. It also would be difficult to draw polygons in such a way that they exclude areas that the company does not serve.

In short, in contrast to mobile providers, wireline broadband providers such as Comcast do not record broadband coverage information using geospatial data for internal purposes. Thus, mandating the use of that format for Form 477 reports would impose a substantial cost without providing any significant new information for the Commission's analysis of broadband deployment.

***Fully-Served Census Blocks.*** Another possible approach suggested by the Commission “would be to require broadband providers to identify blocks that they can fully serve.”<sup>27</sup> This proposal would not materially augment the deployment information that Comcast, and likely others, currently submit and, consequently, would not provide

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<sup>25</sup> Geocoding generally is required in order to create geospatial data. As a result, requiring the submission of geospatial data would require many providers to incur the significant burdens associated with geocoding.

<sup>26</sup> See, e.g., Mobile Broadband Deployment, FCC Form 477, *How Should I Format My Mobile Broadband Deployment Data?*, at 2, [https://transition.fcc.gov/form477/MBD/formatting\\_mbd.pdf](https://transition.fcc.gov/form477/MBD/formatting_mbd.pdf) (“All map areas must be closed, non-overlapping polygons with a single, unique identifier.”).

<sup>27</sup> FNPRM ¶ 43.

the Commission with any important new insights into the state of broadband deployment. The adoption of this approach, however, would significantly increase the burden of preparing the deployment reports.

As is likely the case with other service providers, Comcast's broadband footprint is not designed to cover the contours of census blocks. Thus, under this approach, in almost all, if not all, cases, Comcast would be required to file data for the same census blocks about which it currently provides information. The process of preparing Form 477 reports under this alternative, however, would be more complicated and time-consuming. In particular, after mapping its service locations to census blocks, Comcast then would have to take the *further* step of verifying whether it serves or could serve every customer location within a particular census block. As noted above, Comcast would need to undertake a site-by-site analysis to determine whether new locations could be served by its "all-fiber"-based product.<sup>28</sup> With respect to its HFC-based offerings, Comcast's database includes all of the locations the company serves and the locations the company could serve, but not all of the locations it cannot serve. As a result, this step would not be a simple undertaking.

This approach would become even more onerous if the Commission also decided to "collect geocoded deployment data for blocks that are less-than-fully covered from each provider."<sup>29</sup> Preparing these geocoded data would be a highly laborious process and, in this case, it would be unlikely to produce data that are particularly helpful to the Commission. As the Further Notice observes, the collection of this geocoded information

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<sup>28</sup> See discussion *supra* at Section III.

<sup>29</sup> FNPRM ¶ 43.

would not “address other challenges, such as the accuracy of geocoding, or the challenge of determining where locations lie along road segments.”<sup>30</sup> In sum, this data collection requirement would not satisfy any reasonable cost-benefit analysis.

***Service Address Data.*** In 2013, the Commission “decline[d] to gather fixed broadband deployment data at a level more granular than the census block because the added complexity and burden are unlikely at this time to provide a significant insight into how many residences and businesses lack access to service.”<sup>31</sup> While producing data at a service address level could provide some new insight into broadband deployment, if the Commission were to require this new approach, it should remain mindful of these concerns today and work to minimize the burdens on the Commission and providers as described below. Indeed, the Commission has acknowledged that were it to implement a service address approach, it would need to take steps to minimize the increased burdens on providers and the Commission.<sup>32</sup>

With respect to “complexity,” the use of service address data to measure broadband penetration would dramatically increase the volume of data submitted to the Commission.<sup>33</sup> Although Comcast maintains records of current customer addresses, the

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<sup>30</sup> *Id.*

<sup>31</sup> 2013 477 Order ¶ 35 (further indicating that “many providers do not maintain broadband network deployment data on an address-by-address basis” and that “rural areas where networks are deployed may not have ‘street’ addresses assigned”).

<sup>32</sup> FNPRM ¶ 39 (“If the Commission requires service address reporting, we seek comment on ways the Commission could make the reporting less burdensome on providers and the Commission.”).

<sup>33</sup> Requiring providers to submit service address information also could raise serious privacy concerns. Accordingly, depending on the specific information that service providers would be required to submit under the service address approach, the



existing Form 477 reports are provided at the census block level. Comcast estimates that changing the reports to the service address level would increase the size of its Form 477 filings (*i.e.*, the rows of data) by a factor of more than 35.

The Commission appears to be generally aware that use of the service address approach would substantially increase the volume of information that the agency would have to process. The Further Notice observes that, on an industrywide basis, the increase in volume could be as drastic as going from 70 million records to 750 million records per filing,<sup>34</sup> and therefore “could require significant additional time and other resources to establish and carry out.”<sup>35</sup>

If it were to adopt the service address method, one possible option for reducing the volume of Form 477 data would be to limit the obligation to areas designated as rural by the Commission in its rural call completion proceeding.<sup>36</sup> While providers would still need to cross-map their service address information to census blocks in rural areas and provide that information on Form 477, the burden of producing such information, and of internally reviewing and verifying this information, would be considerably smaller. In addition, to the extent that the Commission wishes for service providers to geocode the data, limiting the requirement to rural areas would reduce the substantial burdens associated with that process.

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Commission may need to establish additional safeguards, particularly if the Commission intends to disclose some or all of the information in some fashion in the future.

<sup>34</sup> FNPRM ¶ 39 n.63.

<sup>35</sup> *Id.* ¶ 39.

<sup>36</sup> See *Rural Call Completion*, Report and Order and Further Notice of Proposed Rulemaking, 28 FCC Rcd 16154 (2013).

Even if the Commission limited the service address reporting obligation to rural areas, the agency, at a minimum, would need to upgrade substantially the transfer capacity of the systems that providers use to upload Form 477 data. Comcast and other reporting entities that have large amounts of data to file must be able to automatically upload the data to a secure FCC server in batches, such as via a secure file transfer protocol. In fact, the Commission previously recognized that technical improvements would be needed for the “Commission, in the future, to consider collecting additional data.”<sup>37</sup>

Finally, consistent with the above concerns and to further minimize the additional burdens of a service address approach, the Commission should change the Form 477 filing requirement to an annual obligation. This would afford service providers adequate time, particularly during the initial years of implementation, to compile and verify accurate information and complete the expanded Form 477,<sup>38</sup> while also further reducing the costs and burdens on the Commission to process, analyze, and report on this much higher volume of more granular information.

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<sup>37</sup> 2013 477 Order ¶ 70; *see also id.* ¶ 69 (directing the “Wireline Competition Bureau, in consultation with the Wireless Telecommunications Bureau, to explore technical improvements to the Form 477 filing mechanism that may make the process easier for filers”).

<sup>38</sup> FNPRM ¶ 56. As the Commission previously has pointed out, “accuracy may actually decrease when granularity increases to the address level because all service providers do not necessarily record addresses in a standardized, uniform manner.” 2013 477 Order ¶ 35. *See also* Comments of AT&T Inc., WC Docket No. 11-10, at 36-37 (Mar. 30, 2011); Comments of the Independent Telephone and Telecommunications Alliance, WC Docket No. 11-10, at 3 (Mar. 30, 2011); Comments of the National Cable & Telecommunications Association, WC Docket No. 11-10, at 9-10 (Mar. 30, 2011).

**V. THE COMMISSION SHOULD NOT REQUIRE PROVIDERS TO REPORT “COMMITTED INFORMATION RATE” OR OTHER SPEED DATA FOR BUSINESS, ENTERPRISE, OR GOVERNMENT SERVICES**

Irrespective of whether the Commission decides to retain separate reporting indicators for mass market/consumer and business/enterprise/government services,<sup>39</sup> providers should not be obligated to report “committed information rate” (“CIR”) or other speed data for business/enterprise/government services. The Commission indicates that the “information collected for consumer/residential/mass market data already provides the necessary bandwidth data” for the agency’s use in the “Broadband Progress Report, Universal Service Fund proceedings, the *2017 BDS Order*, as well as mergers and other transactions.”<sup>40</sup> As a result, the “added CIR data for business/enterprise/government services do not appear to provide additional useful insight.”<sup>41</sup> The Commission nevertheless seeks comment on how to “collect data reflecting the speeds offered to business/enterprise/government end-users in the absence of CIR data.”<sup>42</sup> Requiring providers to incur the costs of submitting data that the agency itself acknowledges will not furnish any “additional useful insight” would not serve the public interest.

**VI. CONCLUSION**

For the foregoing reasons, the Commission should reject Form 477 proposals that would impose significant new burdens on providers and/or the Commission without

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<sup>39</sup> FNPRM ¶ 31.

<sup>40</sup> *Id.*

<sup>41</sup> *Id.*

<sup>42</sup> *Id.*

providing the Commission with meaningful new insight into the state of broadband deployment. If the Commission ultimately decides to use the service address approach to obtain more granular data, it should limit that obligation to rural areas where the more detailed information is likely to be the most helpful and change the Form 477 filing requirement to an annual obligation.

Respectfully submitted,

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