



October 10, 2017

Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: WC Docket No. 11-10

The Board of Directors of NSGIC, the National States Geographic Information Council, a 501c(6) nonprofit organization, submits the comments articulated below in response to the FCC's request for comment with regard to Modernizing the FCC Form 477 Data Program (WC Docket No. 11-10).

In general, the Board believes that the questions posed seem to indicate that the FCC is well-informed with respect to geographic-based data requirements needed for making sound broadband policy. *There are several items that we would like to expand upon through these comments.*

NSGIC believes that the best data format for mapping broadband service depicts the actual physical boundaries in which a provider has the ability to deliver service within a reasonable service order time frame (e.g. 5-10 business days). This approach allows each broadband technology solution to be treated similarly, makes the map data easiest to visually and analytically consume for a broad range of audiences, avoids introducing difficulties associated with surrogate geographies (e.g. census tabulation areas or road centerlines), and should be well within the bounds of best and reasonable practices for industry (i.e. geographically tracking your service capabilities).

NSGIC supports increasing the level of granularity at which the Form 477 data is collected. NSGIC believes that the mapping of discrete physical sites—to include all addressed properties—where broadband and other communication services are likely to be demanded is the key companion map reference layer needed to complement the nation's broadband analysis needs. Address and site points, especially in rural America, are exactly where broadband buildout and un- and under-served locations need to be tracked to accomplish the FCC's policy goals of a fully broadband connected nation. Geocoding using address ranges, aggregation to census block or zip code geography, and the modelling services along road centerlines are very poor substitutes for the discrete representations of the location (x,y) of actual addressed properties and other sites.

For three very compelling reasons detailed below, **NSGIC encourages the FCC to explore partnership and financial support to complete the [National Address Database](#) (NAD) effort being co-led by USDOT and the Bureau of the Census, under the auspices of the Federal Geographic Data Committee.**

- First, as described above, the inventory of addressed and other site points, especially in rural communities and other remote sites, together with actual physical coverage boundaries of existing broadband coverage and speeds, present both a visual dashboard of to-date broadband service accomplishments as well as a map-based guide to the critical work left to be done to ensure broadband access to education, commerce, public safety, and citizen engagement.



- Secondly, both FCC and USDOT have mission requirements to facilitate the nation's transition to nationwide implementation of Next Generation 911 (NG9-1-1) technology that modernizes and greatly expands the technical capabilities to receive and respond to life-threatening local emergencies. If not a foregone conclusion, it is extremely likely that NG911, through the GIS-related data and process standards underway within the National Emergency Number Association (NENA), will require the same address and site point location map layers that are so valuable to facilitating broadband connections for our country's remaining un/under-served locations and for the validation of 911 caller location and call routing to the appropriate public safety answering point (PSAP). The same address and site point location map layers that are so valuable to facilitating broadband connections are also required under NENA NG9-1-1 standards for the validation of 911 caller location and call routing to the appropriate PSAP.
- Thirdly, supporting the build out and use of the NAD by all providers would result in providers submitting the same location for an address since they would be geocoding against the same source dataset.

While these geographically-enabled addresses and site descriptions are not necessarily something that must be required of broadband providers, this data resource, where it does not already exist, will need to be built and made operational for other applications. NSGIC supports reduction of duplication and the idea of building data once to be used many times. In addition, it is certainly reasonable to require any federally funded broadband projects or subsidized deployments to build and share publicly a map layer of the impacted sites. In general, future FCC support to complete a nationwide site/address location mapping seems like an obvious opportunity, both for multiagency partnership at the federal level and for engagement of state government to facilitate a standardized, complete, and sustained collection of this data.

Finally, **NSGIC voices its support for publishing all provider coverage and speed data submitted under Form 477 into the public domain. The FCC should set an ambitious goal of publicly publishing all provider coverage and speed data collected under Form 477 within 90 days of the passing of the submission deadline as raw, machine-readable data, in the form of an interactive map and data application that facilitates the exploration and use of this information.**

NSGIC appreciates the opportunity to provide comments on the issues the FCC has identified that relate to the Modernization of the Form 477 and the mapping of broadband and critical supporting data resources. This is very important national policy work and we thank you in advance for your consideration of this submission.

Sincerely,

Molly Schar
Executive Director