



October 17, 2018

**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**

Dear Ms. Dortch:

On October 15, 2018, Lynn Follansbee, Jon Banks and Mike Saperstein, USTelecom, Jeff Lanning and Richard Rousselot, CenturyLink, Mike Lieberman and Ola Oyefusi, AT&T, AJ Burton, Frontier, Thomas Whitehead, Windstream and Ian Dillner, Verizon, met by phone with Arielle Roth, Legal Advisor to Commissioner O'Reilly to discuss the FCC Form 477 proceeding.

During the meeting, USTelecom and its members expressed support for the Commission's efforts to identify unserved areas through the collection and mapping of data from the existing FCC Form 477 while at the same time discussing the challenges presented by various types of reporting methods. Fixed broadband providers understand that the Commission's goal is to get more detailed information as to where broadband is available so that the Commission can then determine where broadband is not available. That said, fixed broadband providers also uniformly agree that the Commission's August 2017 subcensus block proposals<sup>1</sup> seeking to achieve more granular reporting are (a) not technically feasible, (b) would result in inaccurate data, and (c) will not provide the Commission with the insight the Commission is seeking to obtain.

Generally, carriers know where their network is and where existing and some potential customers are located, however, this information is available via street addresses—it is not geocoded by latitude and longitude. Carriers are not geocoding specialists and since a single, public nationwide database of addressable structures does not exist, each carrier must use third party software to spatially estimate the specific latitude and longitude coordinates. This geocoding process, while mostly accurate in urban and suburban areas, does not work well for rural America because the available data is less robust.

In addition, while generally accurate, geocoding in and of itself is fraught with inconsistencies. . Each of the major geocoding software package relies on different base data (streets, names, address ranges) and use different placement methodologies, which can produce conflicting results.<sup>2</sup> If the FCC were to require all carriers to report geocoded locations it would have to determine how to handle the unavoidable variability introduced by different geocoding methodologies before it could make any use of the data.

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<sup>1</sup> See *In the Matter of Modernizing the FCC Form 477 Data Program*, Further Notice of Proposed Rulemaking, WC Docket No. 11-10, 32 FCC Rcd 6329 (Aug. 3, 2017).

<sup>2</sup> See Letter of Mary L. Henze, AVP- Federal Regulatory, AT&T, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 10-90 (Sep. 4, 2018).

Since the subcensus block proposals in the Commission's FNPRM face challenges both in implementation and their ultimate utility, USTelecom advocates that the Commission should instead spend its time and efforts on creating a database of all locations in the United States and then ask carriers to identify which of those locations they serve. Because there is no single source of location data that is publicly available or reasonably priced, for either the carriers or the FCC to use the providers suggest that the Commission begin to build one.

In order to support this effort, providers support *confidentially* providing to the FCC all known addresses that they have in their databases – both current and previous customer addresses. The Commission could then take this data and eliminate duplicates, build on what is provided with publicly available parcel data, crowdsourcing, or some other governmental or commercially available source that meets their requirements for usability. The Commission should then geocode those addresses using a consistent methodology and use the resulting database as the basis for carrier reporting of service availability.<sup>3</sup> Having the FCC, or some other centralized entity, harmonize the data and do the geocoding is critical to ensuring consistency. USTelecom members pointed to, as an example, an effort that the state of Georgia has underway that seeks to create this same type of database at the state level.<sup>4</sup>

USTelecom members firmly believe that this is where the FCC should be focusing their resources rather than attempting to collect some other form of marginally more granular data that will not produce the type of data needed to both identify and solve the rural broadband problem. USTelecom noted on the call that members would likely be able to comply with a proposal to allow broadband providers to submit road segment data of their service availability. However, given the time it would take to adopt and implement submission by road segment, USTelecom believes that the better use of resources would be to move forward with the address database proposal.

Please contact the undersigned should you have any questions.

Respectfully submitted,

USTELECOM



By: \_\_\_\_\_

B. Lynn Follansbee  
Vice President – Law & Policy

cc: Arielle Roth

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<sup>3</sup> Also see, Letter of Ola Oyefusi, Director- Federal Regulatory, AT&T Services, Inc, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 11-10 and 10-90 (Oct. 12, 2018) which describes this proposal in additional detail.

<sup>4</sup> See, erratum of Ola Oyefusi, Director- Federal Regulatory, AT&T Services, Inc, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 11-10 and 10-90 (Oct. 16, 2018).