February 28, 2019

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554
2550 M Street, NW
Washington, DC 20037

Re: *Modernizing the FCC Form 477 Data Program*, WC Docket No. 11-10

Dear Ms. Dortch:

On February 27, 2019, I had a telephone conversation with Steve Rosenberg, Chief Data Officer for the Wireline Competition Bureau about proposals in the record to revise the Form 477 broadband reporting process.

In this discussion I reiterated points GCI Communications Corp. previously has submitted on the record, including in its October 25, 2018 *ex parte* submission.[1] We discussed the merits of requiring fixed broadband providers to submit polygon shapefiles in lieu of the census block availability data currently required by the Commission's rules. Providers could generate these shapefiles using a variety of business records. This approach would allow the Commission relatively quickly to significantly improve the accuracy of its broadband coverage data. Shapefiles are used in multiple other contexts which demonstrates that any technical and operational challenges could be overcome.

We also discussed that, like other providers, GCI's serviceability data are far from complete and GCI often knows with certainty whether it can serve a particular location only after it turns up service. The Commission therefore should require providers to certify to providing the Commission with the best information they have about the areas they can serve rather than that the data accurately reflect the serviceability of every physical location inside a polygon.

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[1]   Letter from Julie A. Veach, Counsel to GCI Communication Corp., to Marlene H. Dortch, Secretary, FCC, Docket No. 11-10 (filed Oct. 25, 2018).

Please contact me if you have any questions.

Respectfully submitted,

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