

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

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

**REPLY COMMENTS  
OF  
WTA – ADVOCATES FOR RURAL BROADBAND**

WTA – Advocates for Rural Broadband (“WTA”) hereby submits its reply comments with respect to the Commission’s *Further Notice of Proposed Rulemaking*, FCC 17-103, released August 4, 2017 in the referenced proceeding (“*FNPRM*”). WTA limits its reply comments to the proposal of The Wireless Internet Service Providers Association (“WISPA”) that wireless providers of fixed broadband service be given the “option” of reporting their deployment data by “filing geospatial data showing coverage areas (i.e., polygons of coverage filed via shapefiles or rasters)” rather than reporting by census blocks (WISPA Comments, p. 6).<sup>1</sup>

WISPA’s proposal raises critical and substantial questions as to the type of data the Commission wants from the FCC Form 477 filings, and how it plans to use this data. Like wireless Internet service providers (“WISPs”), WTA’s rural local exchange carrier (“RLEC”) members provide fixed voice and broadband services to household and business locations in rural areas. If FCC Form 477 data is to be used by the Commission to determine what areas (and how many and what locations in such areas) have fixed voice services and fixed broadband services at specified speeds, and/or whether multiple service providers offer competing voice and broadband services to specific areas and locations, the data submitted by all fixed service providers must be in the same format so that it can be readily aggregated and compared. Put

---

<sup>1</sup> WTA also disagrees with WISPA regarding the frequency of FCC Form 477 filings, and other factual and policy matters.

another way, the Commission should require the same technologically neutral FCC Form 477 data from all fixed voice and broadband providers so that it can examine, match and differentiate the fixed areas and fixed locations they claim to serve, and so that its data collection and analysis efforts are not obstructed by situations where it is forced to try to combine and contrast apples and oranges.

Most WTA members are small carriers like WISPs, and are similarly burdened by FCC Form 477 filing requirements. A significant number of WTA members serve portions of their service areas via fixed wireless. The latter, in particular, encounter the same problems and difficulties as WISPs, but have been able to provide the same types of FCC Form 477 data for their fixed wireless operations as for their fixed wireline operations.

In its initial comments, WTA reviewed more granular types of data than census blocks, but found that some alternatives were impractical (*e.g.*, many rural areas do not have street addresses) while others were prohibitively expensive (*e.g.*, geocoding in areas where it is not required and performed as part of ongoing Universal Service Fund build-out obligations). WTA offered to work with the Commission to explore more granular and more economical FCC Form 477 data alternatives that would allow the Commission to develop more detailed information regarding the specific areas and locations where fixed broadband service is available at various designated speeds. However, WISPA's proposed geospatial data "option"<sup>2</sup> goes in the opposite direction, and would eliminate or at least grossly complicate the ability of the Commission to continue to determine the availability of fixed services in specific areas and at specific locations on the current census block basis. Rather, WISPA's geospatial data would tell the Commission and other interested parties only that WISP filers may or may not provide some level or levels of

---

<sup>2</sup> While WISPA tries to soft pedal its geospatial data proposal as an "option," it is clear that it expects most (if not all or virtually all) of its WISP members to employ this option rather than the more expensive "boots-on-the-ground" census block approach.

broadband service in portions of “polygons” that do not correspond either with fixed locations or with the census blocks (or possibly more granular areas) for which fixed wireline service providers file their FCC Form 477 data. This geospatial data “option” may or may not be comparable with the FCC Form 477 data provided by mobile wireless service providers, but it appears wholly incongruent and incompatible with the FCC Form 477 data provided by the fixed service provider sector to which WISPs claim to belong.

In sum, whether the Commission determines to continue requiring FCC Form 477 data on a census block basis or a more granular basis, ALL fixed voice and broadband service providers must be required to file the same technologically neutral FCC Form 477 data. WISPA’s proposed superficial and conflicting geospatial data “option” should be rejected.

Respectfully submitted,  
**WTA – Advocates for Rural Broadband**

By: /s/ Derrick B. Owens  
 Derrick B. Owens  
 Vice President of Government Affairs  
 400 7<sup>th</sup> Street NW, Ste. 406  
 Washington, DC 20004  
 (202) 548-0202

Dated: October 24, 2017

By: /s/ Gerard J. Duffy  
 Gerard J. Duffy, Regulatory Counsel  
 Blooston, Mordkofsky, Dickens, Duffy &  
 Prendergast, LLP  
 2120 L Street NW, Suite 300  
 Washington, DC 20037  
 (202) 659-0830