



October 26, 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 25, 2018, Lynn Follansbee and Mike Saperstein, USTelecom, Jeff Lanning, Richard Rousselot and Robert Tice CenturyLink, Mike Lieberman and Ola Oyefusi, AT&T, Ian Dillner, Verizon, AJ Burton, Frontier, Thomas Whitehead, Windstream, and Mike Skrivan and Barbara Galardo (in various combinations either in person or on the phone) met separately with Travis Litman, Legal Advisor to Commissioner Rosenworcel and Jamie Susskind, Legal Advisor to Commissioner Carr 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.

As described in USTelecom's previous ex parte in this proceeding,<sup>1</sup> the parties reiterated their proposal to support this policy goal by proposing to *confidentially* provide to the FCC all known addresses that they have in their databases – both current and previous customer addresses so that 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>2</sup> Parties expressed their support for having the FCC, or some other centralized entity, harmonize the data and do the geocoding as critical to ensuring consistency and that such a database would be extremely important in the context of the CAF program. USTelecom members pointed to, as an

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<sup>1</sup> See Letter of B. Lynn Follansbee, VP–Law & Policy, USTelecom to Marlene H. Dortch, Secretary, FCC, WC Docket No. 11-10, (Oct. 17, 2018).

<sup>2</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.

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example, an effort that the state of Georgia has underway that seeks to create this same type of database at the state level<sup>3</sup> and noted that a map created in this fashion could also be useful in the context of location reporting in the Connect America Fund proceeding, WC Docket No. 10-90.

USTelecom members also expressed their belief 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 other sub-census block submissions, 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: Travis Litman  
Jamie Susskind

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<sup>3</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).