

February 14, 2019

The Honorable Ajit Pai
Chairman
Federal Communication Commission
445 12th Street, SW
Washington, DC 20554

Dear Chairman Pai:

After a preliminary review of speed test data submitted through the Mobility Fund II (MF-II) Challenge Process (Challenge Process), you announced an investigation into potentially significant violations of the Federal Communications Commission's (FCC) mapping rules and the submission of incorrect coverage maps. While we agree that a thorough and expeditious review of these mobile broadband coverage maps is a step in the right direction, it will not solve the broader mapping problems that the Challenge Process has brought to light. In order to get an accurate snapshot of the actual broadband services – mobile and fixed – available to people on the ground, we need to have more, not fewer, data points, and a dynamic, ongoing process that allows individual consumers and outside stakeholders to validate data that broadband providers submit.

The Challenge Process for MF-II was aptly named because collecting and submitting information for the FCC maps was, indeed, a challenge. As you know, by the end of the eight-month challenge window, of the 106 entities who signed up to participate, less than twenty percent submitted and certified valid challenges. The fact that so few participants were able to submit challenges during this process is staggering and shows that the FCC needs to reevaluate their approach to make the coverage data validation process more user-friendly and encourage public participation.

While the MF-II Challenge Process did have its flaws, we should look to it as the beginning of a new, collaborative mapping process that encourages people to participate, rather than the end of an imperfect experiment. While the impediments to participation were simply too difficult and expensive for many state and local officials to overcome, we should not lose sight of the fact that they want to be a part of this process and the FCC should capitalize on this.

The parent whose child cannot complete their homework at night because they do not have the ability to connect to the internet can certainly tell you they don't have coverage. So can the doctor struggling to access electronic medical records at a rural hospital. That is why we believe crowdsourced data has the ability to play an invaluable role in improving broadband coverage maps and the creation of a continuous public feedback mechanism deserves further investigation by the Commission.

One way the FCC may be able to do this is by allowing the use of data from consumer initiated speed tests, including commercial data sets that take advantage of such data, to help supplement Form 477 data. Further, the FCC could look to incorporate the data from states like many of ours who have begun to take mapping into their own hands using voluntary public speed tests, drive tests and GIS software to create their own maps on a more localized and granular level.


While we are glad the FCC is trying to address some of the issues with their mapping though the ongoing Form 477 proceeding, this alone will not solve everything. As long as we continue to rely solely on carrier-reported Form 477 data, we will never have a complete picture that accurately depicts the real world experiences of Americans. That is the lesson we should learn from the Challenge Process.

We are not suggesting that crowdsourced data is perfect and that it alone will be enough to fix the greater challenges with broadband mapping, but it is an important tool we should have in the toolbox. We believe the creation of a public feedback mechanism is feasible and would be a critical first step toward creating more reliable and accurate broadband maps. Therefore, we respectfully ask for a formal and prompt response to the following questions and would welcome the opportunity to meet with you or your staff to discuss them further:

- Do you see validity in using a continuous public feedback mechanism to help improve broadband coverage maps and data?
- Do you think it is feasible for the FCC to implement a public feedback mechanism to help validate Form 477 data?
 - If so, what would that process look like?
 - If not, what specifically can the FCC use to help supplement Form 477 data in determining where there is broadband coverage in the United States?

We look forward to your response and continuing our work together to close the digital divide.

Sincerely,

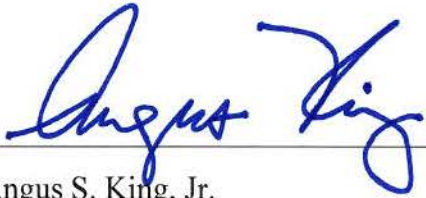

Joe Manchin III
United States Senator
James Lankford
United States Senator



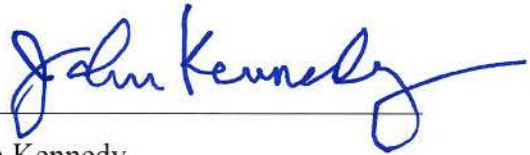
Margaret Wood Hassan
United States Senator



Shelley Moore Capito
United States Senator



Angus S. King, Jr.
United States Senator



John Kennedy
United States Senator



Michael F. Bennet
United States Senator

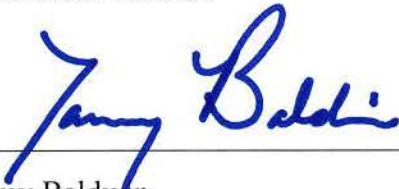
Marsha Blackburn
United States Senator



Doug Jones
United States Senator



Amy Klobuchar
United States Senator



Tammy Baldwin
United States Senator



FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

OFFICE OF
THE CHAIRMAN

April 26, 2019

The Honorable Joe Manchin
United States Senate
306 Hart Senate Office Building
Washington, D.C. 20510

Dear Senator Manchin:

Thank you for your letter regarding broadband mapping. Closing the digital divide is my top priority. I have seen for myself in 45 states and the territories of Puerto Rico and the Virgin Islands what affordable high-speed Internet access can do for a community—for its families, its schools, its hospitals, its farms, its businesses—as well as the impact of its absence.

I agree that using updated and accurate broadband deployment data is critical to bridging the digital divide. We need to understand where broadband is available and where it is not in order to target our efforts and direct funding to areas that are most in need. That is why the Commission initiated two basic reforms to the collection of broadband data when I came into office. First, we initiated a new data collection for mobile broadband coverage as part of Phase II of the Mobility Fund (which included a robust challenge process). Second, we began a top-to-bottom review of the Form 477 process in order to ensure that broadband data was more accurate, granular, and ultimately useful to the Commission and the public.

In your letter, you ask whether a continuous public feedback mechanism will improve the Commission's broadband coverage maps and its Form 477 data. I believe it could. Indeed, as you may know, the Commission's Speed Test App is one way consumers can currently participate in collecting data about broadband deployment, and it has proven to be a useful tool for assessing service availability. I've asked Commission staff to look into other ways to collect and use accurate data from many sources—including consumers themselves—to assemble a more reliable map. We are interested in developing methods for the submission of reliable, consumer-driven data in order to better inform the Commission's decision making in this area. We would be happy to receive any input you or your staff might have on how to establish and implement such methods.

I appreciate your continued interest in working with the FCC to close the digital divide and look forward to continuing to collaborate on this issue. Please let me know if I can be of any further assistance.

Sincerely,

A handwritten signature in dark ink, appearing to read "Ajit V. Pai".

Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

OFFICE OF
THE CHAIRMAN

April 26, 2019

The Honorable James Lankford
United States Senate
316 Hart Senate Office Building
Washington, D.C. 20510

Dear Senator Lankford:

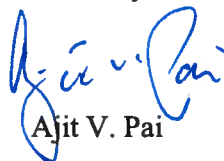
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Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

OFFICE OF
THE CHAIRMAN

April 26, 2019

The Honorable Maggie Hassan
United States Senate
330 Hart Senate Office Building
Washington, D.C. 20510

Dear Senator Hassan:

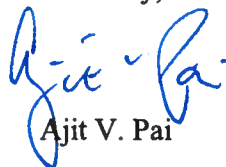
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Sincerely,



Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

OFFICE OF
THE CHAIRMAN

April 26, 2019

The Honorable Shelley Moore Capito
United States Senate
172 Russell Senate Office Building
Washington, D.C. 20510

Dear Senator Capito:

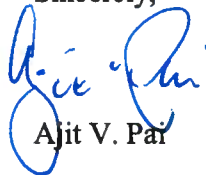
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Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

OFFICE OF
THE CHAIRMAN

April 26, 2019

The Honorable Angus King
United States Senate
133 Hart Senate Office Building
Washington, D.C. 20510

Dear Senator King:

Thank you for your letter regarding broadband mapping. Closing the digital divide is my top priority. I have seen for myself in 45 states and the territories of Puerto Rico and the Virgin Islands what affordable high-speed Internet access can do for a community—for its families, its schools, its hospitals, its farms, its businesses—as well as the impact of its absence.

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Sincerely,



Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

OFFICE OF
THE CHAIRMAN

April 26, 2019

The Honorable John N. Kennedy
United States Senate
383 Russell Senate Office Building
Washington, D.C. 20510

Dear Senator Kennedy:

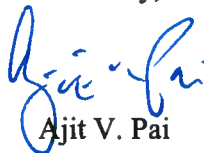
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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

OFFICE OF
THE CHAIRMAN

April 26, 2019

The Honorable Michael Bennet
United States Senate
261 Russell Senate Office Building
Washington, D.C. 20510

Dear Senator Bennet:

Thank you for your letter regarding broadband mapping. Closing the digital divide is my top priority. I have seen for myself in 45 states and the territories of Puerto Rico and the Virgin Islands what affordable high-speed Internet access can do for a community—for its families, its schools, its hospitals, its farms, its businesses—as well as the impact of its absence.

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Sincerely,


Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

OFFICE OF
THE CHAIRMAN

April 26, 2019

The Honorable Marsha Blackburn
United States Senate
B40B Dirksen Senate Office Building
Washington, D.C. 20510

Dear Senator Blackburn:

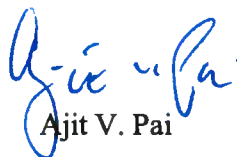
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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

OFFICE OF
THE CHAIRMAN

April 26, 2019

The Honorable Doug Jones
United States Senate
326 Russell Senate Office Building
Washington, D.C. 20510

Dear Senator Jones:

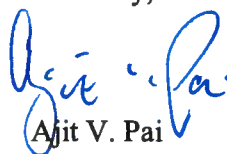
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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

OFFICE OF
THE CHAIRMAN

April 26, 2019

The Honorable Amy Klobuchar
United States Senate
302 Hart Senate Office Building
Washington, D.C. 20510

Dear Senator Klobuchar:

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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

OFFICE OF
THE CHAIRMAN

April 26, 2019

The Honorable Tammy Baldwin
United States Senate
709 Hart Senate Office Building
Washington, D.C. 20510

Dear Senator Baldwin:

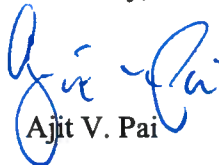
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