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May 24, 2019

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Portals II, Room TW-A325
Washington, DC 20554

RE: *Modernizing the FCC Form 477 Data Program, WC Docket No. 11-10; Connect America Fund, WC-10-90*

Dear Ms. Dortch:

On May 23, 2019, James Stegeman of CostQuest Associates, Inc. (CostQuest) met with Preston Wise. The purpose of the meeting was to discuss CostQuest's experience developing geographic data reflecting broadband coverage.
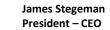
CostQuest has broad experience related to broadband coverage. This experience includes the following areas:

1) Predictive geostatistical broadband coverage models which supported the National Broadband Plan,
2) Developing, normalizing and testing provider submitted broadband coverage for the State Broadband Initiative; and,
3) Consuming broadband coverage necessary for cost modeling and reverse auction support.

In the meeting, CostQuest described potential benefits that could accrue from the use of non-TIGER[1] geographic features including point or polygonal broadband coverage. Regarding polygonal broadband coverage, the benefits over the current TIGER basis could include improved sub-Census Block analysis and enhanced visibility of broadband served and unserved areas.

CostQuest believes that there may also be negative factors that could impact the utility of non-TIGER polygon-based coverage. These negative factors could be present if the methods used to derive the broadband coverage polygons are unclear, the source data are not directly causal to broadband service, the testable attribute that the polygons reflect is unclear and the effort or quality checks are insufficient. As carriers maintain outside plant information in many formats and systems, a variant and complex data normalization process will be necessary if provider outside plant data is the source of broadband coverage polygons.

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[1] TIGER refers to geographic data developed by the US Census Bureau delineating roads, boundaries and other features.

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Considering the presence of polygonal broadband coverage, two other challenges are notable. First, polygons do not necessarily lend themselves to quantifying and demonstrating the number of unserved locations. Specifically, the polygon may be present at the sub-Census Block level, but how will that polygon be used to identify, test and quantify served and unserved locations? Finally, polygonal coverage may lead to an administrative challenge in managing feedback at the address or location level. How will location level feedback on broadband presence impact a coverage polygon?

CostQuest appreciates the opportunity to work with the Commission and contribute information. As required by the Commission's rules, this *ex parte* record is now filed in the above referenced dockets.

Sincerely,

/s/
James W. Stegeman,
President / CEO CostQuest Associates, Inc.