

**Congress of the United States**  
**Washington, DC 20515**

258

May 6, 2019

The Honorable Ajit Pai  
Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

Dear Chairman Pai:

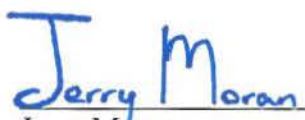
We write regarding the Federal Communications Commission's (FCC) ongoing efforts to improve the accuracy of its Form 477 collection of voice and broadband subscription and deployment data. As the principal tool used by the FCC to gather data on communications services to inform policymaking, the current Form 477 data collection processes fall short in depicting where fixed and mobile broadband services are available or lacking, with one of the most extreme examples of inaccuracy found in our home state of Kansas. This is especially problematic because this data is used to determine where billions of federal dollars are allocated for broadband deployment. As such, we encourage the FCC to address concerns related to the precision of this critical data collection that informs federal funding so important to our rural communities, and prevents the overbuilding of existing broadband networks.

The FCC's current broadband availability maps, particularly in the context of fixed broadband access shown by the National Broadband Map, do not utilize data that is granular enough to adequately depict broadband availability in rural communities. Form 477 data collection policies dictate that an entire census block be considered served with broadband service even if that service is only offered to one location within the census block. Since census blocks in rural communities are larger than their urban counterparts, rural communities are particularly threatened by this policy. As a result, Kansas communities could be denied eligibility to participate in existing federal funding programs for broadband deployment regardless of their actual need. With methods such as shapefile format submissions already used to increase granularity of mobile broadband availability depictions, the federal government should consider every tool at its disposal to improve the granularity of all broadband maps.

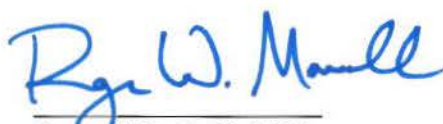
Additionally, the validation of data submitted to broadband availability databases needs to be bolstered. As the FCC takes steps to improve the quality of broadband availability maps, it should seriously consider verification mechanisms that extend beyond the self-certification of initial data submissions by providers. The Mobility Fund Phase II initial eligibility map highlighted the issues of relying on self-reported data indicating broadband availability in Kansas, but it also demonstrated the importance of a robust and meaningful challenge process, which required significant time and resources of the challenging parties. Therefore, standardized validation of broadband availability, including a challenge process that allows independent entities to participate, is vital to any data collection that affects the distribution of federal resources for broadband deployment.


Many Kansans' access to affordable and reliable broadband services relies on federal programs that distribute resources for deployment, like the programs administered within the FCC's Universal Service Fund. But if the information that the federal government uses is not specific or accurate, the agencies administering these programs are not equipped to make appropriate decisions. In the interest of effectively allocating federal resources to unserved and underserved communities, we urge the FCC to take immediate action to improve the granularity and accuracy of broadband availability maps, especially as new broadband funding initiatives like the Rural Digital Opportunity Fund are rolled out. Thank you for your attention to this important matter.


Sincerely,

  
Jerry Moran  
United States Senator

  
Pat Roberts  
United States Senator

  
Roger Marshall, M.D.  
Member of Congress

  
Sharice L. Davids  
Member of Congress

  
Steve Watkins  
Member of Congress

  
Ron Estes  
Member of Congress



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

May 23, 2019

The Honorable Jerry Moran  
United States Senate  
521 Dirksen Senate Office Building  
Washington, D.C. 20510

Dear Senator Moran:

Thank you for your letter regarding broadband mapping. Closing the digital divide is my top priority. I have seen for myself in 45 states, including our beloved home state of Kansas, 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.

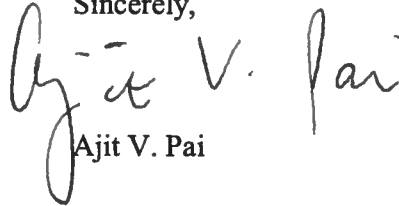
I agree that using updated and accurate broadband deployment data is critical to bridging the digital divide. We need to understand where broadband is available and where it is not to target our efforts and direct funding to areas that are most in needed. That is why the Commission two basic reforms 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 to ensure that broadband data was more accurate, granular, and ultimately useful to the Commission and the public.

In your letter, you ask the Commission seriously consider verifications mechanisms, specifically a challenge process that allows independent entities to participate, to improve the validation of data submitted to broadband availability databases. I believe a public feedback mechanism could improve the Commission's broadband coverage maps and Form 477 data. Indeed, as you may know, the Commission's Speed Test App is one way that 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 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.

Page 2—The Honorable Jerry Moran

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,

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Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION  
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OFFICE OF  
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May 23, 2019

The Honorable Pat Roberts  
United States Senate  
109 Hart Senate Office Building  
Washington, D.C. 20510

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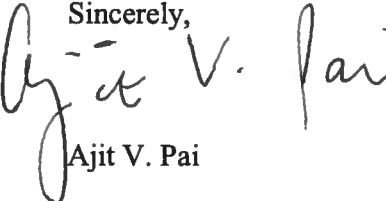
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WASHINGTON

OFFICE OF  
THE CHAIRMAN

May 23, 2019

The Honorable Roger Marshall  
U.S. House of Representatives  
312 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman Marshall:

Thank you for your letter regarding broadband mapping. Closing the digital divide is my top priority. I have seen for myself in 45 states, including our beloved home state of Kansas, 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.

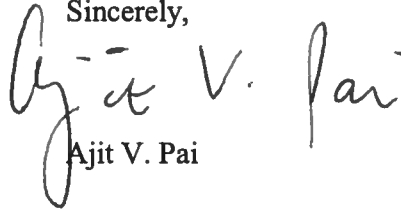
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Ajit V. Pai





FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

May 23, 2019

The Honorable Sharice Davids  
U.S. House of Representatives  
1541 Longworth House Office Building  
Washington, D.C. 20515

Dear Congresswoman Davids:

Thank you for your letter regarding broadband mapping. Closing the digital divide is my top priority. I have seen for myself in 45 states, including our beloved home state of Kansas, 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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OFFICE OF  
THE CHAIRMAN

May 23, 2019

The Honorable Ron Estes  
U.S. House of Representatives  
1524 Longworth House Office Building  
Washington, D.C. 20515

Dear Congressman Estes:

Thank you for your letter regarding broadband mapping. Closing the digital divide is my top priority. I have seen for myself in 45 states, including our beloved home state of Kansas, 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.

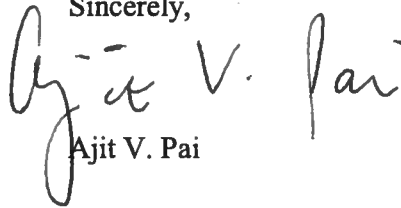
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OFFICE OF  
THE CHAIRMAN

May 23, 2019

The Honorable Steve Watkins  
U.S. House of Representatives  
1205 Longworth House Office Building  
Washington, D.C. 20515

Dear Congressman Watkins:

Thank you for your letter regarding broadband mapping. Closing the digital divide is my top priority. I have seen for myself in 45 states, including our beloved home state of Kansas, 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.

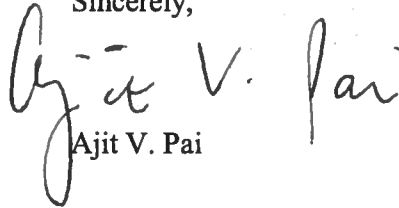
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