

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Establishing the Digital Opportunity Data Collection	)	WC Docket No. 19-195
	)	
Modernizing the FCC Form 477 Data Program	)	WC Docket No. 11-10

**COMMENTS OF COMPETITIVE CARRIERS ASSOCIATION  
ON CTIA’S PETITION FOR RECONSIDERATION**

Competitive Carriers Association (“CCA”)<sup>1</sup> respectfully submits these comments in response to CTIA’s Petition for Reconsideration of the Third Digital Opportunity Data Collection Report and Order.<sup>2</sup> CCA opposes CTIA’s request that the Commission “eliminate the requirement that mobile wireless broadband providers submit signal-strength ‘heat’ maps or, at minimum, require these maps to be submitted only upon request consistent with other verification tools.”<sup>3</sup>

Congress expected that the Commission not only would conduct a new data collection, but would create more reliable maps than prior efforts produced. CCA continues to believe that the disclosure of Received Signal Strength Indicator (“RSSI”) or Reference Signal Received

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<sup>1</sup> CCA is the nation’s leading association for competitive wireless providers and stakeholders across the United States. Members range from small, rural carriers serving fewer than 5,000 customers to regional and nationwide providers serving millions of customers, as well as vendors and suppliers that provide products and services throughout the wireless communications ecosystem.

<sup>2</sup> Petition for Reconsideration of CTIA, WC Docket Nos. 19-195, 11-10 (filed May 7, 2021) (“Third DODC Order Petition”).

<sup>3</sup> *Id.* at 1.

Power (“RSRP”) levels by technology will provide useful information that will improve the quality of the collected data and help the Commission and industry assess and compare coverage maps.

At the same time, CCA is mindful that the DODC should not overburden wireless carriers with excessive obligations. Put simply, the Commission should focus on the quality of the data collected rather than the quantity of maps. For these reasons, CCA continues to agree with CTIA that the Commission should eliminate the requirement to model in-vehicle coverage for each mobile wireless technology because such in-vehicle maps would be unnecessarily burdensome. CCA also agrees that the Commission should align the confidentiality of link budgets for mobile wireless providers consistent with the treatment of link budgets for fixed wireless providers.

## **DISCUSSION**

### **I. DISCLOSURE OF RSSI OR RSRP VALUES WILL PROVIDE USEFUL DATA THAT WILL IMPROVE THE RELIABILITY OF MAPS**

In its Petition, CTIA urges the Commission to eliminate the requirement of carriers to provide heat maps showing RSSI or RSRP levels, or at a minimum only require them upon request.<sup>4</sup> CTIA argues against requiring heat maps because they were not mandated by the Broadband DATA Act,<sup>5</sup> provide duplicative data, and “signal strength is not a reliable predictor of consumer experience.”<sup>6</sup>

CCA continues to believe that RSSI and RSRP provide the best estimation of network performance and are effectively the calculated output of various parameters that will be used to

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<sup>4</sup> *Id.* at 5.

<sup>5</sup> Broadband Deployment Accuracy and Technological Availability Act, Pub. L. No. 116-130, 134 Stat. 228 (2020) (“Broadband DATA Act”).

<sup>6</sup> Third DODC Order Petition at 6.

generate coverage maps.<sup>7</sup> As CCA has previously discussed, calculating coverage metrics is a complicated process. Different network technologies require different mathematical formulas, which rely on a large number of variables. Because the appropriate RSRP may vary depending on a number of factors, the Commission has not defined a specific minimum value. But disclosure of signal strength will help ensure reliable coverage maps and will help in the comparison of maps across carriers.

Although the Broadband DATA Act does not mandate RSSI or RSRP levels, it does direct the Commission to consider “lessons learned” from the MF-II process, and the MF-II Staff Report recommended minimum RSRP as a parameter for future mobile broadband data.<sup>8</sup> And Congress directed the Commission not only to collect new propagation data, but to improve on earlier efforts.<sup>9</sup> CCA believes that the disclosure of signal strength values will do just that. For these reasons, the Commission should maintain its current requirements to disclose RSSI and RSRP heat maps.

## **II. THE COMMISSION SHOULD RECONSIDER THE REQUIREMENT FOR IN-VEHICLE COVERAGE MAPS AND THE DISPARATE CONFIDENTIALITY TREATMENT OF MOBILE AND FIXED WIRELESS LINK BUDGETS**

CCA is mindful that the production of signal strength heat maps is part of what will likely be a quite comprehensive and potentially burdensome data collection process. And CCA is

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<sup>7</sup> See, e.g., Letter from Alexi Maltas, SVP & General Counsel, CCA, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 19-195, 11-10, at 2 (filed May 15, 2020).

<sup>8</sup> Rural Broadband Auctions Task Force Staff Report, Mobility Fund Phase II Coverage Maps Investigation Staff Report at 3, para. 9 (2019), <https://docs.fcc.gov/public/attachments/DOC-361165A1.pdf>.

<sup>9</sup> Broadband DATA Act § 802(b)(3)(B) (directing the Commission to conduct a rulemaking that would “allow for the collection of propagation maps and propagation model details that are as accurate and granular as, *or more accurate and granular than*, the maps and model details collected by the Commission...” (emphasis added)).

particularly attentive to the burdens on small wireless carriers to produce numerous maps. In CCA’s view, the Commission should be focused on the quality of the data collection, rather than the volume of maps to be collected. While the focus on quality counsels in favor of disclosing signal strength maps, CCA continues to agree with CTIA that the requirement to model in-vehicle coverage for each mobile technology would generate burdens that are not outweighed by the benefits.

The Commission included the requirement to model in-vehicle coverage in the Second DODC Order<sup>10</sup> without seeking comment and did not provide adequate justification for requiring two maps for each technology. Further, doubling the number of coverage maps would put an undue burden on both the Commission and providers for the relatively little benefit the additional maps would offer. As T-Mobile notes, “[r]equiring additional maps would add needless complexity” to the Commission’s already formidable tasks and “would impose more burdens on broadband providers without furthering the primary goal of the Broadband DATA Act.”<sup>11</sup> Accordingly, CCA supports CTIA’s request that the Commission reconsider its requirement for in-vehicle coverage maps.

The Commission requires both mobile and fixed wireless service providers to disclose to the Commission details of link budget information.<sup>12</sup> However, the DODC Order inexplicably includes a presumption that this information be confidential for fixed providers but not for

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<sup>10</sup> *Establishing the Digital Opportunity Data Collection, Modernizing the FCC Form 477 Data Program*, Second Report and Order, FCC 20-94, WC Docket Nos. 19-195 and 11-10, (rel. July 17, 2020) (“Second DODC Order”).

<sup>11</sup> Comments of T-Mobile USA, Inc., *Modernizing the FCC Form 477 Data Program*, WC Docket Nos. 19-195 and 11-10 at 5 (filed Sept. 9, 2021).

<sup>12</sup> Second DODC Order ¶ 48.

mobile wireless providers.<sup>13</sup> The Commission acknowledges that some of the information it asks of fixed wireless providers “may be commercially sensitive or raise security concerns.”<sup>14</sup> The Second DODC Order does not articulate any reason why those concerns would be lessened for mobile networks and no sound reason for the Commission to apply a lesser standard of confidentiality to mobile providers. CCA therefore urges the Commission to reconsider this aspect of the Second DODC Order to apply the same presumption of confidentiality of link budgets to both fixed and mobile providers.

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CCA and its members remain committed to closing the digital divide and ensuring that the Commission is equipped with the data necessary to create more reliable maps. The Commission should be mindful that more reliable data will come from high quality maps based on improved parameters rather than a large number of maps that may be overly burdensome for carriers to generate. CCA looks forward to working with the Commission to generate improved data so that we can effectively target critical funding to close the digital divide.

Respectfully submitted,

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<sup>13</sup> Compare Second DODC Order ¶ 31 with *id.* ¶ 49.

<sup>14</sup> Second DODC Order ¶ 31.