June 7, 2019

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

> **Re:** *Modernizing the FCC Form 477 Data Program,* WC Docket No. 11-10

Dear Ms. Dortch:

As a follow-up to its Notice of Ex Parte Presentation dated May 17, 2019[1], Connected Nation wishes to offer clarifying comments regarding a potential path forward to achieve the goal of obtaining more granular and accurate broadband availability information to reliably identify areas that lack access to broadband—one that will ultimately result in the creation, validation, and continual improvement of a new National Broadband Map.

First, after having reviewed comments that have been recently filed with the Commission in this proceeding, Connected Nation believes that there is value in the creation of a common dataset of locations nationwide (i.e., geolocated *structures,* or land parcels such as *cropland* and *ranchland*, that may warrant broadband service delivery), on which broadband service availability information can be subsequently overlaid. Such a dataset has been called a "broadband serviceable location fabric" by the coalition led by USTelecom, but the dataset's utility could just as well apply across a myriad of industries beyond broadband. Since the concept was first proposed last year, Connected Nation believes that there has been a general lack of understanding regarding the purpose of the "fabric," and how broadband data would relate to it. However, there is now much greater clarity that its purpose would be to serve as a common reference point where the coordinates of structures (or cropland/ranchland) can be precisely identified, so that once broadband service availability information is paired with it, the Commission, other Federal agencies, and the public at-large can know with great precision which locations currently can and cannot be served.

Second, there is increased clarity that broadband service availability data can be reported and georeferenced against the location fabric in multiple ways. For example, wireline service providers that wish to generate polygon shapefiles of their service availability footprints could report to the Commission in that way, while wireless providers could report realistic propagation models of their coverage footprints based on factors defined by the Commission. Alternatively, since the location fabric (as Connected Nation understands it) will include precise latitude and longitude coordinates (as well as unique identifiers) for every address across the United States, service providers could elect to report a list of addresses or ID numbers that they are capable of serving. Any of these reporting methodologies can all be georeferenced against the location fabric so that the resulting maps clearly define whether service can be delivered at each location.

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[1] See, e.g., Letter of Brent Legg, VP Government Affairs, Connected Nation, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 11-10 (May 17, 2019)

This means that the proven methodologies employed by Connected Nation in states like Minnesota and Kansas can result in datasets that can be referenced against the underlying location fabric to define with specificity the structures that fall within—and outside of—a provider's given coverage footprint.

For these reasons, Connected Nation now believes there is a viable path forward that can involve both a polygon shapefile-driven reporting approach (including propagation modeling for wireless services), as well as the option to report addresses or ID numbers instead—both of which can be referenced against a more accurate underlying fabric of locations/structures. This means service providers could choose the reporting approach that works best for them, with the location fabric merely serving as a common reference point for the various datasets.

In closing, Connected Nation wishes to emphasize that some level of GIS-processing support for smaller service providers will be necessary to achieve greater data granularity, regardless of the approach adopted by the Commission. This will be necessary to ensure that providers without internal GIS capabilities are not unduly burdened by these new reporting requirements and to ensure that information they report is as accurate as possible on the frontend. Connected Nation also believes that the production of a truly accurate National Broadband Map must include a routine and ongoing challenge process, as well as targeted in-field validation of provider-submitted data. These important steps will ensure that the new National Broadband Map is continually refined over time.

Please contact me if you have any questions.

Respectfully submitted,

/s/ *Brent Legg*

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