

June 10, 2019

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

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

Dear Ms. Dortch:

I write to you on behalf of the millions of rural Americans who are currently unserved and underserved by high-speed broadband. We, the undersigned organizations, believe that reliable access to broadband services will offer tremendous social and economic benefits to producers, growers, ranchers, and their families. As a leading voice for these small business owners and their communities, our organization is committed to standing up for policies that help to ensure their full participation in our vibrant and growing digital economy.

In this spirit, we wish to formally express our support for the **USTelecom Broadband Mapping Initiative**. This common-sense approach represents the most cost-effective solution to jump start the access challenges confronted by rural Americans. Experts project the total cost of this national mapping project to be between \$10 – 12 million – a tiny fraction of the FCC’s \$350 million proposal for a similar effort. The producers that we represent can sell their goods with confidence when they are certain of market conditions. They deserve that same level of certainty when it comes to access to digital goods and services that are indispensable for business and civic engagement today. The economic opportunities waiting to be unlocked by improved access to high-speed broadband far exceed already competitive price that USTelecom identified.

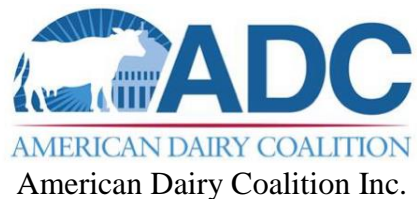
Full participation in our modern economy and society also requires visibility. The Broadband Mapping Initiative represents an infrastructure and investment plan that can rapidly scale to meet the needs of rural Americans. The result will be more flexible, granular maps – down to the level of every individual home that must be serviced – and more precise data on national broadband coverage. This level of accuracy is achieved using “geocoding.” By contrast, the proposed “polygon” map template would trade precision for marginal gains in the speed of implementation. Furthermore, under this framework any homes located within the polygon area would be counted as covered, regardless of whether they are actually being serviced. This would doubtless leave many homes still uncounted and defeat the purpose of this effort, which is to help close gaps in rural broadband coverage. The Broadband Mapping Initiative would result in more accurate location information within eighteen months – just six months more than the proposed polygon approach. We cannot afford to cut corners on broadband coverage.

Embracing a cooperative effort to guarantee more precise and continuously improving coverage data will yield long-term and second-order benefits for the communities we represent. Applying geocoding techniques to better understand gaps in serviceable areas is just the beginning of what access to new technologies will make possible. The Broadband Mapping Initiative will lay the foundation for a more flexible, national map on which to build the cutting-edge networks, products and services of the future. The high quality of the geocoded location information it will collect can help to accelerate the deployment of connected healthcare, public safety, energy, and transportation solutions that have the potential to revolutionize how *all* Americans connect with the world around them. The polygon proposal is narrow by contrast, and simply won't be built with this kind of forward-looking functionality in mind.

The Broadband Mapping Initiative is an opportunity to make a tangible impact in the everyday lives of honest and hardworking Americans choosing to live in rural America, now and in the future. Further, positive reports from the pilot programs in Virginia and Missouri are encouraging and demonstrate that this approach is the best way forward to help close the digital divide. As such, we urge the FCC to support the Broadband Initiative framework and continue to invest in transformative public-private projects.

Please do not hesitate to contact us with any questions about this important effort.

Respectfully,



United States Cattlemen's Association



Rural and Agriculture Council for America