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|  | Federal Communications Commission  Washington, D.C. 20554 |

June 12, 2017

**VIA ECFS ELECTRONIC DELIVERY**

Ms. Marlene H. Dortch, Secretary

Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554  
  
Re: Measuring Broadband America Program (Fixed Collaborative), GN Docket No. 12-264  
  
Dear Ms. Dortch,  
  
On May 3, 2017, members of the Commission Staff met with representatives of broadband providers, public interest groups, companies, and other organizations for a collaborative meeting to continue discussions pertaining to the fixed Measuring Broadband America (MBA) program.[[1]](#footnote-1)

After general introductions, Walter Johnston, Chief, EMCD/OET welcomed all the collaborative members and introduced Roxanne Robinson, Head of Client Services at SamKnows to present the agenda for the meeting.[[2]](#footnote-2) The following topics were discussed:

1. **Home view update:** At previous collaborative meetings, SamKnows discussed plans for a user-friendly “health page” for panelists to review their own whitebox measurements. Based on the feedback received from the collaborative, SamKnows simplified the health page to show only the latest set of test results for the panelist and compare it with the advertised value without specifically grading the results to specified thresholds. Panelists may also review charts and raw data detailing historical results by selecting other menus. Participants inquired about the wordings used in describing the measurement parameters. SamKnows explained that revised text and an updated version would be made available to the collaborative. SamKnows promised to work closely with the working group in rewriting the health page before presenting the final revised version to the collaborative at the next meeting. Mr. Johnston reminded the collaborative that this health page is limited only to the small number of panelists on an ISP’s service tier and is meant to better engage the volunteers to participate in the MBA effort.
2. **Automated Validation update:** SamKnows discussed work with ISPs to improve and automate various steps of the validation process. Participants in the Working Group met several times since the last collaborative meeting and discussed various information exchanged between SamKnows and the ISPs for the validation process. Ms. Robinson noted that SamKnows would work individually with each ISP to align the current automation process with the ISP’s existing operating procedures. SamKnows will be working on this process over the next few months and hopes to be able to implement the automated validation procedures by the end of the year.
3. **Key Dates:** Ms. Robinson highlighted a number of key dates of the 2017 MBA project plan. With respect to status of the drafting of the 2017 MBA Report, SamKnows discussed it would provide the FCC final draft of charts by May 5. To prepare for the September 2017 collection and preparation of the 2018 Report, SamKnows asked the participating ISPs to submit subscribership numbers for each tier on April 20 and as of April 27 received responses from many ISPs. Participating ISPs were asked to support the process of validation of panelists to specific ISP tiers (for the September reporting month) earlier this year than it had in previous years to provide more time to complete recruiting prior to data collection in September. SamKnows will share the sample plan with each ISP listing the speed tier for all the MBA panelists on May 5. ISPs were asked to review and correct any errors in the designated speed tier for the panelists and inform SamKnows of any such errors by May 18. Mr. Johnston mentioned that in past years some ISPs have reported validation errors at a very late stage, creating delays in the issuance of the MBA Report. Mr. Johnston thanked ISPs for their efforts and emphasized the need for completing the validation process in a timely manner. Ms. Robinson discussed procedures for ISPs likely to experience any change in September, such as expected upgrades to tiers during the measurement period. She requested ISPs to inform SamKnows of any such impending upgrades in speed tiers during the tier validation process. Ms. Robinson reiterated that the main aim of this process is to make sure that there are sufficient panelists reporting for each tier. For tiers with insufficient number of panelists, SamKnows will work jointly with the ISPs to begin recruitment in early June.
4. **New MBA weighting methodology:** Recent MBA Reports have included overall ISP download and upload speed statistics using a weighted mean of medians for each of the ISP tiers. The statistic relies upon weightings calculated using subscriber numbers provided either directly by the ISPs or from the FCC’s 477 data. Mr. Sam Crawford, CTO SamKnows, explained the algorithm used in the past required consideration of both the number of subscribers and the number of whiteboxes in calculating the weighted mean of medians for the service tiers. Mr. Crawford proposed the use of a simpler approach that requires only the number of subscribers. SamKnows analysis comparing results using the newly proposed and existing approaches show results that are almost identical. Participants expressed interest in reviewing the analysis, and Mr. Crawford offered to share more on the analysis along with updated Home View page with the collaborative in coming weeks.
5. **Speed tier inclusion/exclusion policy:** In response to requests by ISPs to remove certain tiers from the 2017 Report, FCC staff conducted an internal review to confirm past procedures regarding the removal of service tier results from previous Reports. FCC staff members identified a variety of examples of new tiers added to past Reports, but found no clearly articulated past policy with regard to the removal of tiers. After internal discussions, FCC staff members drafted a policy proposal regarding speed tier deletion from the MBA. Mr. Razdan, Electronics Engineer, Office of Engineering and Technology at the FCC, presented an overview of the proposed MBA policy regarding addition and deletion of tiers. Mr. Razdan pointed out that there was a clear policy with regard to inclusion of an ISP tier which required: (a) at least 30,000 subscribers for that tier and (b) the tier’s subscribership should form a minimum of 5% of the ISPs total subscriber base.[[3]](#footnote-3) This policy accommodated a consideration of the costs associated with including new tiers in terms of soliciting new panelists for these tiers in order to have a statistically significant sample and in providing whiteboxes to these panelists.

Staff noted that once a tier is created, there are only minimal costs associated with maintaining the tiers even if membership falls below 5%. Additionally, an ISP could have multiple number of tiers within a speed range wherein each tier might represent less than 5% of the total subscriber count, but when taken together, could add up to a significant subscriber base. In the past, the only reason for removal of a tier from the MBA Report was if the tier had been upgraded (e.g., due to upgrade of the infrastructure by the ISPs from DOCSIS 2 to DOCSIS 3) or if, despite all efforts, there were not enough panelists available to provide a statistically significant sample. Going forward it is proposed that a speed tier would be removed from the MBA Report only when the number of panelists fall below the statistically significant number needed to report on that tier. Mr. Johnston emphasized that SamKnows and the ISPs would continue to try soliciting new panelists in such an event, unless the subscribership number to the tier falls below 30,000. Once the subscribership falls below 30,000 no attempts would be made by SamKnows to solicit new panelists. Some participating ISPs expressed a desire that tiers using legacy technology be not included in the report. Mr. Johnston clarified that for the cases where an ISP has legacy tiers that it no longer advertises, the MBA report can include a note to indicate this. Along with the revised home dashboard test description and the explanation for the changed weighting methodology an update on the policy for addition and deletion of tiers will be provided to the collaborative[[4]](#footnote-4).

Mr. Johnston concluded by thanking all the attendees for their active participation.

Sincerely,  
  
/s/ Rajender Razdan  
  
Rajender Razdan, Electronics Engineer,  
Electromagnetic Compatibility Division/OET  
Federal Communications Commission

1. A list of attendees is attached to this filing in GN Docket No. 12-264. [↑](#footnote-ref-1)
2. SamKnows presentation is attached to this filing in GN Docket No. 12-264. [↑](#footnote-ref-2)
3. See, for example Section 2.2, second bullet item in 2016 MBA Report Technical Appendix. [↑](#footnote-ref-3)
4. These documents, sent to the collaborative on May 19 are attached to this filing in GN Docket 12-264. [↑](#footnote-ref-4)