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

June 20, 2018

**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 24, 2018, members of the Commission Staff met with representatives of broadband providers, public interest groups, companies, and other organizations in a collaborative meeting to discuss plans 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, Global Head of Client Services at SamKnows to present the agenda for the meeting.[[2]](#footnote-2) The following topics were discussed:

1. **2017 MBA Report update:** Mr. Johnston informed the collaborative that the 2017 MBA Report (which has been renamed as the Seventh MBA Report) had gone through the editing process but was still waiting for final approval by the Chairman’s office. Once the approval is given, the ISPs would be provided a chance to provide comments, which once resolved, would result in the final issuance of the Report.
2. **Current MBA Project Status Update:** Ms. Robinson noted that the MBA project was progressing smoothly as per the timeline described in the April meeting. She was pleased to announce that, barring one ISP, she had received everyone’s signed Code of Conduct for 2018. Ms. Robinson also mentioned that she would be starting the process of recruiting new panelists for the ISP tiers and would be seeking help from the ISPs in the recruitment process. Mr. Johnston informed the collaborative that the FCC is seeking to increase the sample size to 100 panelists per service tier over a two-year period. SamKnows has allocated an extra 4,000 whiteboxes this year to help increase the panelists numbers per tier. Ms. Robinson explained that she would be doing an inventory of the currently reporting whiteboxes for the tiers that would be included for the report; and would determine the number of panelists that would need to be added for the under-represented tiers. Mr. Johnston explained that the goal was to reach 75 panelists per tier for this year and eventually 100 panelists per tier for next year. The main reason for increasing the sample size was to provide a more statistically significant dataset for use in the report.
3. **Hardware SDK:** SamKnows announced that in addition to the Linux based whiteboxes that it has been using to measure the broadband performance of ISPs, they had developed a new software development kit (SDK) that allows third-party vendors to embed the speed measurement tests inside their hardware devices. Across the globe there has been a exponential growth in the number of registered devices that use SamKnows SDK from slightly more than 200,000 in May 2017 to over 1 million devices by May 2018. Over 240,000 devices using SamKnows SDK are currently online within the USA. In their presentation, SamKnows showed a map of USA with the number of such registered devices for each individual state. Mr. Johnston explained that this was something that was developed independent of the MBA project by SamKnows. However, if used, it did have the potential to greatly increase the user base for the MBA measurement. Additionally, this could help in providing greater coverage over rural areas, thus providing the means for the FCC to audit the ISP infrastructure buildup funded by the FCC’s Connect America Fund (CAF). A number of questions were raised regarding the exact operation of the SDK, the validation process and the list of vendors supporting this SDK on their hardware. One of the participants mentioned that SamKnows should consider re-participating in standards bodies like the Broadband Forum and create a standard around their SDK solution. Mr. Johnston pointed out that the main purpose of the current meeting was bring this new opportunity to the attention of the collaborative. The FCC would be willing to arrange a separate call with SamKnows to discuss all the details regarding this SDK. Members interested in this topic were urged to contact Mr. Rajender Razdan at the FCC.
4. **Other Topics:** A question was raised about the need, looking into the near future, to develop whiteboxes that are capable of measuring Gigabit speeds. Ms. Robinson assured the collaborative that SamKnows has been actively working on this, and pointed out that their latest deployed whitebox version 8.0 did handle measurement of download and upload speeds of up to a Gigabit per second. Another issue that was raised was with respect to a number of emails from mLab publicly available on the NY State Supreme Court website regarding a litigation case against Charter, which, according to the participant raised concerns whether mLab was acting in good faith as a neutral third party for purposes of testing and whether we should continue using the mLab platform for the MBA measurements. Mr. Johnston reminded the group that the MBA program did not only use the server platforms from mLab but it also the server platforms from Level 3. The use of multiple platforms provided a level of robustness to the MBA measurements that would not be possible with using just a single platform. Mr. Johnston noted that like other participants, mLab has signed a code of conduct which is taken seriously by the MBA team and that he would be looking more closely into the matter.

Mr. Johnston concluded the meeting 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)