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July 25, 2017

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

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

Dear Ms. Dortch:

On July 21, 2017, the undersigned of Comcast Corporation (“Comcast”) and Emily Daniels of Lawler, Metzger, Keeney & Logan, LLC, outside counsel to Comcast, met with Dr. Jay Schwarz, Wireline Advisor to Chairman Pai. During the meeting, the parties discussed the Commission’s proposed Further Notice of Proposed Rulemaking (“Further Notice”) regarding possible revisions to FCC Form 477, focusing on whether the form should include information regarding the deployment of Wi-Fi facilities when they are “offered to consumers in conjunction with resold mobile service.”<sup>1</sup>

While it is unclear whether seeking additional information about the deployment of Wi-Fi access points would add to an understanding of broadband deployment (since those access points are necessarily interconnected to broadband facilities already being reported), the Commission should revise the language in the Further Notice as follows before the item is adopted:

For example, while Wi-Fi facilities traditionally have provided consumers with portable, not mobile, wireless connectivity, are there circumstances in which the Form 477 should track deployment of such facilities when offered to consumers in conjunction with mobile service? In particular, should the Form 477 track deployment of Wi-Fi facilities if a firm with a large number of Wi-Fi hotspots either (a) integrates those gateways with a wireless network so that a consumer seamlessly can use the Wi-Fi hotspots as part of a mobile broadband service offering, or (b) hands off a consumer’s Wi-Fi connection seamlessly from one location to the next, essentially converting a portable wireless offering into a mobile service?

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<sup>1</sup> *Modernizing the FCC Form 477 Data Program*, WC Docket No. 11-10, Further Notice of Proposed Rulemaking, FCC-CIRC1708-03, ¶ 14 (rel. July 13, 2017).

Pursuant to section 1.1206(b) of the Commission's rules, 47 C.F.R. § 1.1206(b), this *ex parte* notification is being filed for inclusion in the public record of the above-referenced proceeding.

Respectfully submitted,

/s/ Beth Choroser

Beth Choroser

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cc: Dr. Jay Schwarz