



July 26, 2019

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

Re: *Ex Parte* disclosure pursuant to 47 C.F.R. § 1.1206(b) in WC Docket Nos. 19-195, 19-126, and 10-90

Dear Ms. Dortch:

On July 24, 2019, Francella Ochillo and Cat Blake of Next Century Cities met with Travis Litman of Commissioner Jessica Rosenworcel's office to discuss proposals detailed in the Digital Opportunity Data Collection (WC Docket No. 19-195) and Rural Digital Opportunity Fund (WC Docket Nos. 19-126 and 10-90) notice of proposed rulemaking documents.

Next Century Cities is a nonprofit 501(c)(3) coalition comprised of over 200 member municipalities across the United States that work to bring fast, affordable, reliable broadband to their constituents. We represent the voices of local broadband leaders and advocate for federal telecommunications policies that support local connectivity initiatives.

As stated in the meeting, Next Century Cities' members share the Commission's concerns about broadband data collection and would like to be partners in efforts to improve. Local leaders are directly impacted by the effects of policies built on flawed data. Many are taking the initiative to compile their own crowdsourced datasets to get a more accurate picture of connectivity at the local level. For example, Cat described Louisville, Kentucky's SpeedUp project, which collects speed and cost data from residents in order for the city to get an accurate account of broadband availability. Cat and Francella suggested that municipal leaders engaged in similar endeavors be included in planning discussions with the Commission to ensure that the new federal data collection framework would both incorporate input from and be helpful to local leaders.

Regarding the Rural Digital Opportunity Fund, Francella highlighted concerns about developing a program based on 25/3 mbps speeds, a minimum requirement that will be inadequate in years to come when the program reaches full bloom. Additionally, she pointed out that using flawed data to determine which communities will qualify for Phase I or Phase II of the program could exclude disconnected communities from much-needed broadband deployment resources.



Respectfully submitted,

/s/ Francella Ochillo

Francella Ochillo
Executive Director
Next Century Cities

CC: Travis Litman

