



August 9, 2019

Via ECFS

Marlene H. Dortch
Secretary, Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Re: *Rural Digital Opportunity Fund*; WC Docket No. 19-126; *Connect America Fund*; WC Docket No. 10-90; *Establishing the Digital Opportunity Data Collection*; WC Docket No. 19-195; *Modernizing the FCC Form 477 Data Program*; WC Docket No. 11-10.

Dear Ms. Dortch:

On August 7, 2019, the undersigned, along with USTelecom CEO Jonathan Spalter, met with Commissioner Starks and his Chief of Staff & Senior Legal Advisor William Davenport and on August 8, 2019 with Commissioner Rosenworcel and her Chief of Staff and Senior Legal Advisor Travis Litman. During the meetings we provided a high-level summary of some of the preliminary findings from the Broadband Mapping Consortium Pilot Project that USTelecom is leading along with its partners ITTA and WISPA.¹ Notably, preliminary analysis indicates that structure counts per census block in the pilot states versus 2011 census housing structure data are incorrect for nearly 50 percent of census blocks. The 2011 census housing structure data is both over inclusive and under inclusive, both of which have potential implications for broadband policy. As a result, we described the importance of the Commission moving forward as quickly as possible to adopt a national data set of broadband serviceable locations consistent with USTelecom's Broadband Serviceable Location Fabric (BSLF) proposal. Specifically, we urged the Commission to move towards the adoption of the BSLF simultaneously as it moves forward with the establishment of the new shapefile broadband availability reporting capability. Please direct any questions to the undersigned.

Sincerely,

/s/ Patrick R. Halley

Patrick R. Halley
Senior Vice President, Policy & Advocacy
USTelecom – The Broadband Association

cc: William Davenport
Travis Litman

¹ See Letter from B. Lynn Follansbee, Vice President, Policy & Advocacy, USTelecom to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 11-10, 10-90 (May. 28, 2019); Letter from B. Lynn Follansbee, VP Policy & Advocacy, USTelecom to Marlene H. Dortch, Secretary, FCC, WC Dockets 10-90, 11-10, 19-126 (Jul. 1, 2019).