



Monday, August 7, 2017

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

Re: WC Docket No. 11-10, In the Matter of Reform of the FCC Form 477 Data Program. Development of Nationwide Broadband Data to Evaluate reasonable and Timely Deployment of advanced services to all Americans improvement of wireless Broadband subscribership data; Ex Parte Presentation

Dear Ms. Dortch:

This letter is to notify you that on August 3, 2017 the undersigned and Grant Seiffert of Connected Nation spoke in person with Claude Aiken of Commissioner Mignon Clyburn's office.

The purpose of this discussion was to discuss potential improvements to the Form 477 process of data collection. Connected Nation discussed the need for accurate and granular broadband maps as one of the most critical tools in developing sound broadband policy to close the digital divide. Connected Nation noted that while its mapping efforts have been highly successful, the SBI program as a whole faced a number of challenges, and the current Form 477 data collection process is deficient in several ways. Connected Nation expressed the belief that any future broadband mapping effort must prioritize the accuracy and granularity of broadband maps at the street address or parcel level of detail but must also prioritize the protection of providers' proprietary and confidential information that may be used to derive more granular coverage footprints.

Connected Nation also specifically discussed an analysis of Form 477 data for the State of South Carolina using an interactive GIS map that it created, in which a "confidence rating" process was used estimate the most likely areas of inaccuracy of the Form 477 data and then highlight the known "digital divide," as compared with the potential divide. The map can be accessed here:

<http://cngis.maps.arcgis.com/apps/MapSeries/index.html?appid=9c5895b3a445456283ab7f84ceda9810>

Lastly, Connected Nation briefly discussed its testimony before the U.S. House of Representatives Committee on Energy and Commerce Subcommittee on Communications and Technology on June 21, when CN suggested what it believes is a viable and effective path forward—involving the establishment of a single, independent, third-party clearinghouse for broadband data collection and mapping. This clearinghouse would have responsibility for carrying out four (4) primary tasks:

- 1) Broadband data collection and analysis – working with the provider community through a rigorous non-disclosure agreement framework;
- 2) GIS mapping of broadband availability and speeds – produced from infrastructure and subscriber data submitted by the providers;
- 3) Field validation and audits of the maps once they are produced; and
- 4) Processing feedback submitted by consumers to ensure continual refinement of the maps.

Connected Nation's full written statement may be accessed here:

<http://docs.house.gov/meetings/IF/IF16/20170621/106153/HHRG-115-IF16-Wstate-LeggB-20170621.pdf>

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'J. Brent Legg', with a stylized flourish at the end.

J. Brent Legg
Vice President, Government Affairs

cc: Claude Aiken