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Alan Buzacott
Executive Director
Federal Regulatory and Legal Affairs

August 17, 2020

Ex Parte

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

Re: Establishing the Digital Opportunity Data Collection, WC Docket No. 19-195

Dear Ms. Dortch:

On August 13, 2020, Tamara Preiss and Alan Buzacott of Verizon met by telephone with Garnet Hanly, Erin Boone, Monica DeLong, Janet Young, Tom Tran, Stacy Ferraro, Will Holloway, Jennifer Salhus, Ken Baker, and Kari Hicks of the Wireless Telecommunications Bureau, Steve Rosenberg, Kate Matraves, Matt Collins, Pat DeGraba, and Alex Espinoza of the Office of Economic Analysis, and Kirk Burgee of the Wireline Competition Bureau to discuss the *Order and Further Notice* in the above-captioned proceeding.¹

We explained that the Commission should not adopt additional mapping parameters. The parameters adopted in last month's *Order* fully satisfy the requirements of the Broadband DATA Act. Standardizing additional parameters such as an RSRP value or fade margin would make the maps less, not more, accurate.

We also noted that the *Order's* link budget and propagation model reporting requirements, together with the audit, crowdsourcing, third-party data, and challenge process provisions, already satisfy the Broadband DATA Act's requirement for a verification process. At most, speed test data and infrastructure data should be used for case-by-case verification in small areas, when other verification methods have identified a potential issue.

Finally, we discussed the *Further Notice's* proposals for the challenge process. We explained that the Commission should adopt specific requirements for challengers'

¹ *Establishing the Digital Opportunity Data Collection, Second Report and Order and Third Further Notice of Proposed Rulemaking, WC Docket Nos. 19-195 & 11-10, FCC 20-94 (rel. July 17, 2020) ("Order and Further Notice")*.

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speed tests, and should adopt a meaningful standard for presumptively successful challenges. We also explained that providers should have multiple options for responding to challenges.

This letter is being filed electronically in the above-referenced dockets pursuant to Section 1.1206 of the Commission's rules. Please contact the undersigned with any questions.

Sincerely,

A handwritten signature in black ink that reads "Alan Buzacott". The signature is written in a cursive style with a large initial "A".

Alan Buzacott