



August 20, 2019

Ex Parte

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

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

Dear Ms. Dortch:

USTelecom – The Broadband Association (USTelecom), ITTA – The Voice of America’s Broadband Providers (ITTA) and the Wireless Internet Service Provider Association (WISPA) and their members, (collectively “the Broadband Mapping Consortium” or “the Consortium”) have proposed a long-term solution to make our nation’s fixed broadband mapping more accurate and granular to meet the needs of policymakers, consumers, and broadband service providers.¹ In order to demonstrate to the Commission and other stakeholders that our proposed solution is achievable and can be done nationally in a timely and cost-effective manner, we invested in a Proof of Concept Pilot (“Pilot”), managed by CostQuest Associates, with our collective members, AT&T, CenturyLink, Chariton Valley, Consolidated, Frontier, Riverstreet, TDS, Verizon, and Windstream. Many other providers contributed their coverage and address data to the Pilot.

The Consortium is pleased to submit to the Commission the attached report summarizing the key findings and methodology from our Pilot. Using state-of-the-art technology and a combination of public and commercial datasets, the Pilot demonstrates that it is now possible to identify and precisely locate virtually every structure in a geographic area that is capable of receiving broadband service; this is referred to as the Broadband Serviceable Location Fabric (“Fabric”). Developing the Fabric in our two

¹ See Letter of B. Lynn Follansbee, VP Law & Policy, USTelecom to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 11-10, 10-90 (Mar. 21, 2019).

Pilot states of Missouri and Virginia demonstrates that it is not only possible to do so for the entire country, but it is necessary to achieve our nation's broadband goals.

Millions of Americans continue to lack access to the opportunities enabled by broadband. Policymakers have uniformly agreed on the need to address this challenge. Key to closing the digital divide is an understanding of the precise number and locations of those without access to broadband. While national estimates of the broadband gap have been possible through existing FCC broadband availability reporting, information has not been available at a sufficiently granular level for policymakers to truly identify where broadband is lacking, and thus, where resources can be allocated most efficiently.

Our report shows that regardless of format of broadband reporting (shapefile, propagation map, address, etc.), the reliability and validity of reporting is driven by the quality of the underlying data. The Fabric provides this crucial, but presently missing, link. In addition to other important metrics, our Pilot shows as many as 38 percent of additional rural locations in Virginia and Missouri are unserved by participating providers in census blocks that would have been reported as "served" in today's FCC Form 477 reporting approach. These locations are homes and small businesses hidden from service providers and policymakers simply because of a lack of knowledge fueled by gaps in data—gaps that we can now fill.

The Commission is currently seeking comment in the above-referenced proceedings on how to establish a national dataset of broadband serviceable locations, and how such information could be used to support broadband deployment through programs such as the recently announced Rural Digital Opportunity Fund. To inform these proceedings, we are pleased to submit this report for review by all stakeholders. We appreciate the Commission's continued leadership to improve the information it collects on broadband availability and to close the digital divide.

Respectfully submitted,

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