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August 24, 2017

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: WC Docket No. 11-10

Dear Commissioners:

I support the measurement and reporting of actual Internet speed data at the household level for purposes of FCC Form 477. Under current Form 477 reporting practices, the FCC believes I have a 300 Mbps broadband connection. My actual download speed varies from 0.5 to 8 Mbps over the course of the day. As a rural resident, this discrepancy prevents me from receiving real broadband access through the Connect America Fund and similar rural broadband programs.

Broadband availability can vary greatly within a census block. I live in a large, rural census block that partially abuts a nearby town. A few houses near town have access to cable and DSL services with download speeds up to 300 Mbps. I do not. Yet all data regarding broadband availability that I've seen, including the map at <https://www.fcc.gov/maps/fixed-broadband-deployment-data/>, incorrectly indicate that these services are available throughout the census block.

In my experience, many rural ISPs do not consistently deliver their advertised speeds. I currently pay \$69.95 per month for fixed wireless service advertised to have a 10 Mbps download speed. But I've never received that speed. The highest download speed I've ever measured is 8 Mbps (using a SamKnows Whitebox obtained through the FCC Measuring Broadband America project at a previous address). More often than not, the measured speed drops below 1 Mbps from 7 to 10 pm each evening. This is the best fixed Internet service I can buy.

I understand that my address should have been eligible for Connect America Fund support based on the inability to receive a 10 Mbps connection. But that support has been unavailable both because (1) the local cable company's Form 477 indicates that a few houses in my census block can receive a 300 Mbps connection and (2) the Forms 477 submitted by other ISPs report advertised speeds "up to" 10 Mbps that are not consistently delivered.

Requiring providers to report data at the household level (using any of the methods described in the FNPRM) and to report measured speeds rather than advertised speeds would help rural broadband funding go where it's sorely needed.

Sincerely,

/s/ Brett Ferguson