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September 4, 2018

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

Re: Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch:

On Thursday August 30, 2018 the undersigned and Cathy Carpino of AT&T, met with Alex Minard, Heidi Lankau, Katie King, and Gilbert Smith of the Wireline Competition Bureau. The purpose of the meeting was to discuss AT&T's experience with USAC's HUBB and issues associated with geolocating rural addresses. AT&T urged the FCC to allow CAF recipients to update and correct location information already submitted to the HUBB. In addition, large carriers who are filing hundreds of thousands of locations need a process that allows carriers to submit updated data as batch files.

Today the HUBB allows only limited updates to information on a record by record basis and does not allow changes to the latitude and longitude (lat/long) submitted for a location. AT&T has deployed to and submitted HUBB data for well over 400,000 locations and it has become very clear that standard geolocating software and techniques, at least in rural areas, are inconsistent and change often. The same address input into multiple geocoders will return widely varying lat/longs. Even the same address input into the same geocoder but several months apart will return different lat/long coordinates as underlying data is updated regularly. Presumably such updates are moving towards improved accuracy and thus carriers should be able to update the HUBB accordingly. AT&T shared several examples of the type of lat/long variance commonly seen. Each map displays the result from three industry standard geocoders for an actual CAF II address. Dots 1 and 2 (white and blue) display the result from the same geocoder queried a few months apart. Dots 3 and 4 (green and pink) are the result from a second and third geocoder. Which one is "correct"?

Another concern is that the HUBB requires lat/long coordinates to the sixth decimal place. According to USAC, this is an accuracy range of 4 inches!¹ This

¹ See <https://www.usac.org/res/documents/hc/pdf/tools/Hc-HUBB-FAQ.pdf> at p. 5 of 6.

requirement was never put out for public comment, so we do not know why this level of accuracy was considered necessary for rural areas where houses are more likely to be 50 feet to a mile apart than four inches. And given the inconsistent results across geocoders it provides only a false sense of accuracy. AT&T urged the FCC to have more open dialogue with CAF recipients about geocoding issues and HUBB requirements so that all parties can contribute to making it a better resource.

Sincerely,

Mary L. Henze

Alexander Minard
Heidi Lankau
Katie King
Gilbert Smith

CAF II CBS



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Scale: 1:100,000, 1:200,000, 1:500,000, and this is not a community. Sources: Esri, DigitalGlobe, GeoEye, Earthstar, and other community. Sources: Esri, DigitalGlobe, GeoEye, Earthstar, and other community.

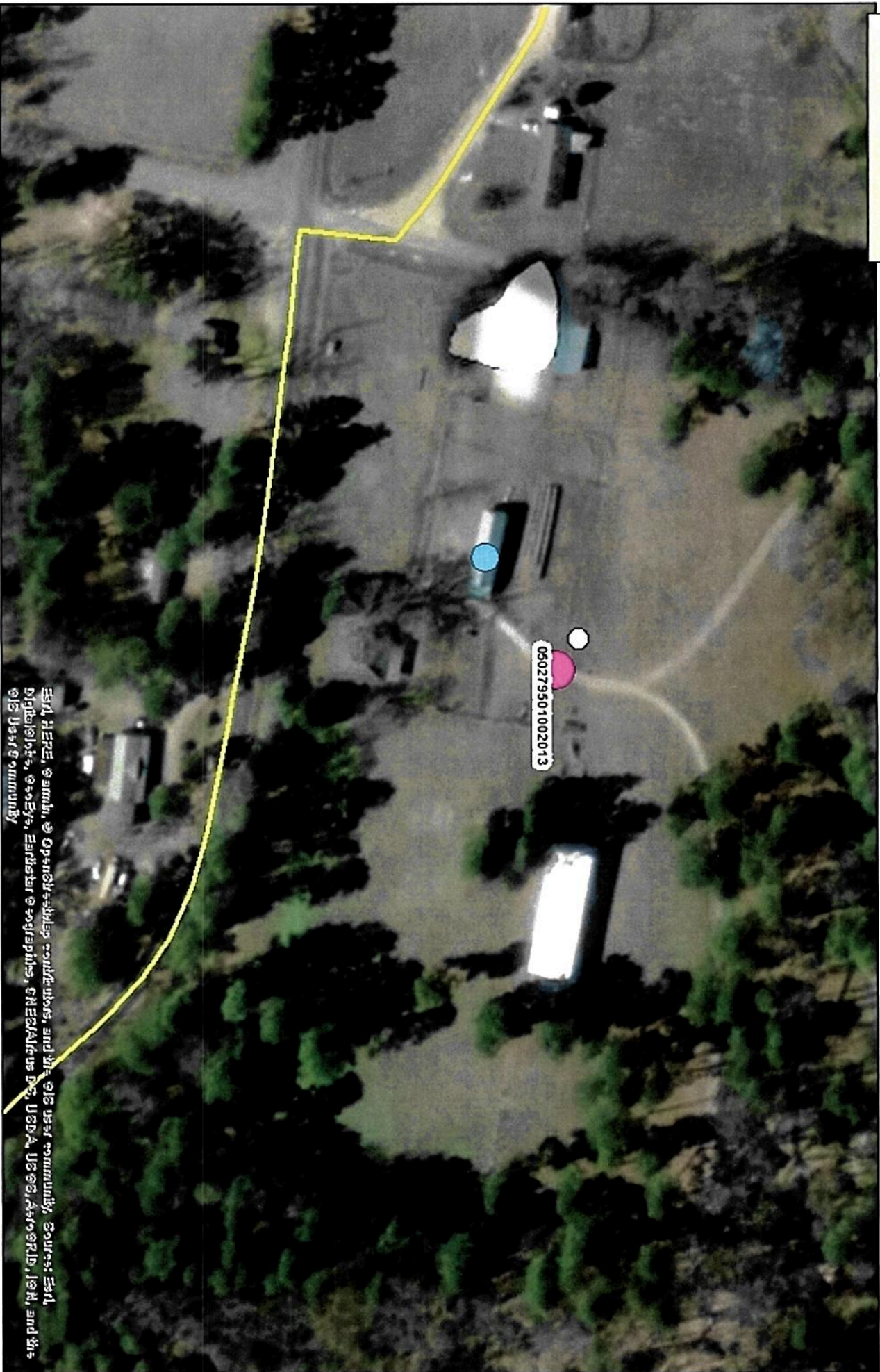
CA FII CBS 0 0.0125 0.025 0.05 Miles



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ESRI, HERE, Garmin, OpenStreetMap contributors, and the GIS user community, Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

CAFI II CBs	0	0.325	0.65	1.3 Miles

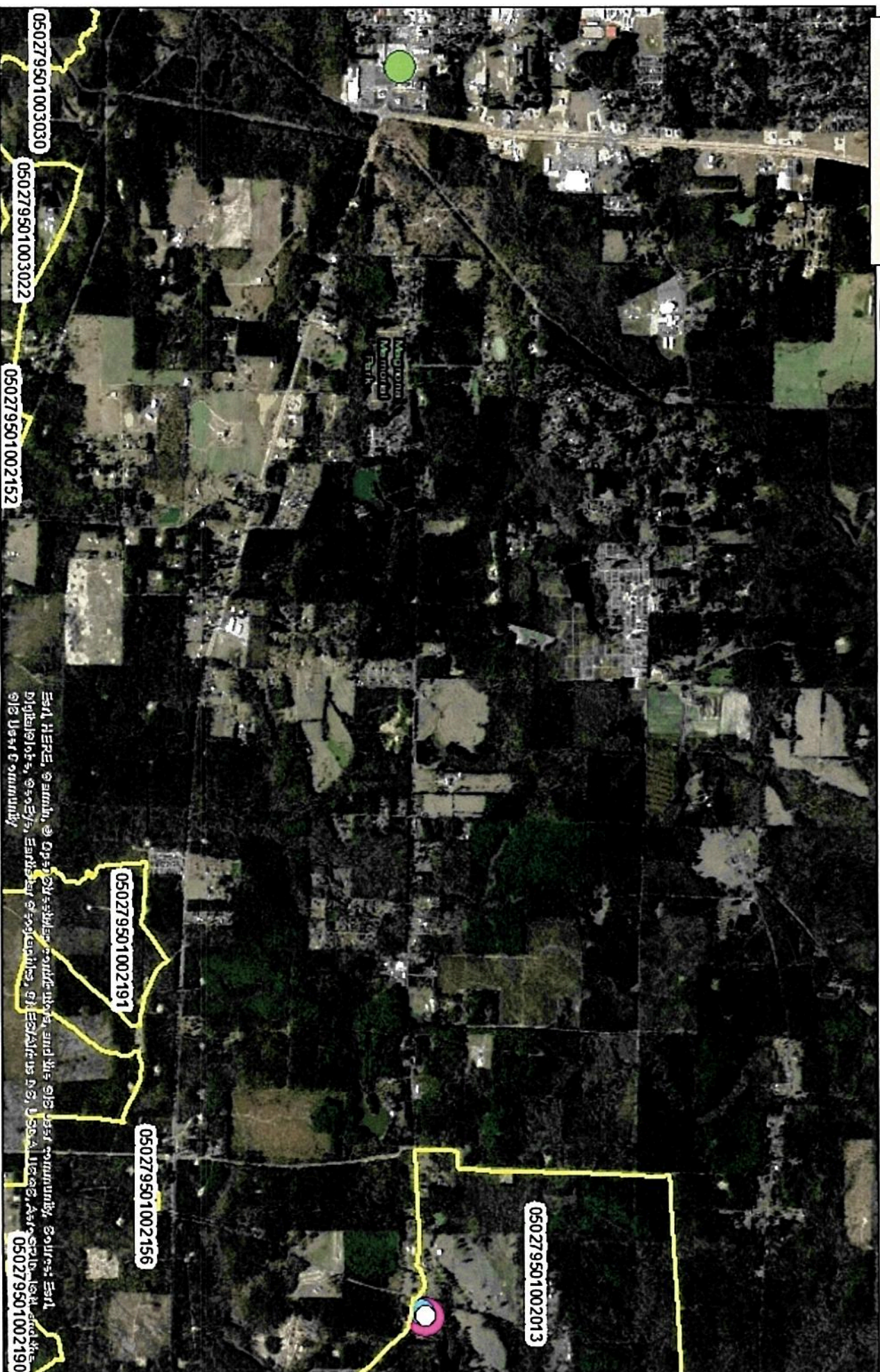


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0 0.0225 0.045 0.09 Miles



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