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September 5, 2018

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

Re: **Wireless Internet Service Providers Association
Modernizing the FCC Form 477 Data Program
WC Docket No. 11-10
Notice of Oral Ex Parte Presentation**

Dear Ms. Dortch:

On September 4, 2018, Claude Aiken, President & CEO of the Wireless Internet Service Providers Association (“WISPA”), S. Jenell Trigg, counsel to WISPA, and undersigned counsel to WISPA met with Commissioner Michael O’Rielly and his Legal Advisor Arielle Roth with respect to the Commission’s proceeding to modernize FCC Form 477 reporting.¹

Consistent with its prior advocacy,² the WISPA representatives urged the Commission to retain semi-annual Form 477 reporting to ensure that data is more current than it would be with annual reporting. Given the rapid growth of fixed wireless broadband customers in recent years as acknowledged by the Commission³ and the fact that fixed wireless broadband can be deployed in much shorter timeframes than cable and fiber, WISPA’s members would be disproportionately harmed if federal subsidies were based on less current – and thus less accurate – subscriber information. For the same reason, the WISPA representatives also encouraged the Commission

¹ *Modernizing the FCC Form 477 Data Program*, Further Notice of Proposed Rulemaking, 32 FCC Rcd 6329 (2017).

² See Letter from Claude Aiken, WISPA President & CEO, to Marlene H. Dortch, FCC President, WC Docket No. 11-10 (filed Aug. 31, 2018); Comments of WISPA, WC Docket No. 11-10 (filed Oct. 10, 2017); and Reply Comments of WISPA, WC Docket No. 11-10 (filed Oct. 24, 2017).

³ The Commission has recognized that residential fixed wireless connections quadrupled from June 2012 to June 2016, the largest percentage increase of any terrestrial broadband technology. See *Internet Access Services: Status as of June 30, 2016*, Industry Analysis and Technology Division, Wireline Competition Bureau (April 2017) at 18.



to reduce the time between the submission of Form 477 and the public reporting of aggregate Form 477 information. In addition, the WISPA representatives reiterated that fixed wireless providers should be permitted to submit geospatial data depicting coverage, in either polygon or raster format, to mitigate costly burdens on small providers while simultaneously giving the Commission and the public a more accurate view of a provider's service area when it establishes support rules. WISPA also urged the Commission to afford Form 477 filers the option of using online visualization and analytical tools to improve data accuracy.

The WISPA representatives voiced their commitment to work with the Commission to improve the accuracy and granularity of Form 477 data.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed electronically via the Electronic Comment Filing System in the above-referenced proceeding.

Respectfully submitted,

/s/ Stephen E. Coran
Stephen E. Coran

cc: The Honorable Michael O'Rielly
Arielle Roth
Claude Aiken
S. Jenell Trigg