

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Establishing the Digital Opportunity Data)	WC Docket No. 19-195
Collection)	
)	
Modernizing the FCC Form 477 Data)	WC Docket No. 11-10
Program)	

**COMMENTS
OF
GVNW CONSULTING, INC.**

September 23, 2019

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Establishing the Digital Opportunity Data Collection)	WC Docket No. 19-195
)	
Modernizing the FCC Form 477 Data Program)	WC Docket No. 11-10
)	

**COMMENTS
OF
GVNW CONSULTING, INC.**

I. INTRODUCTION

GVNW Consulting, Inc. (“GVNW”) submits these comments to address the Federal Communications Commission (“FCC”) request for comments relating to Digital Opportunity Data Collection to enhance the accuracy and usefulness of broadband deployment reporting. Further, to comment on ways that the FCC can develop location-based data that could be overlaid onto polygon-based data to precisely identify the homes and small businesses that have and do not have access to broadband services and other proposed changes as set forth in a Second Notice Of Proposed Rulemaking in the above-captioned docket.¹

GVNW supports the FCC’s efforts to enhance the accuracy and usefulness of broadband deployment reporting and the identification of locations that have and do not have broadband service. GVNW believes that it is essential that the information that is collected and reported be based on set technical standards, be accurate, and subject to a validation or challenge process to

¹ *Establishing the Digital Opportunity Data Collection*, WC Docket No. 19-195, *Modernizing the FCC Form 477 Data Program*, WC Docket No. 11-10, Report and Order and Second Further Notice of Proposed Rulemaking, FCC 19-79 (rel. Aug. 6, 2019).

ensure its accuracy. Further, GVNW believes crowdsourcing can provide valuable input as well as faulty information. In addition, carriers can provide latency reporting along with the polygon-based data reporting. Moreover, a process for location-based reporting could run parallel to the polygon-based reporting, closely aligned with the portal that is being created by USAC.

II. DISCUSSION

A. Set Technical Standards Are Needed To Ensure Accurate Reporting Of Broadband Service To Customer Locations.

GVNW supports the FCC's objective to collect better information relating to the broadband services that carriers provide to customers, the speed of the broadband services offered, and the locations that a carrier can currently provide broadband service or can do so within ten business days without an extraordinary commitment of resources. However, GVNW believes that it is important that the reported information be as accurate as possible and, in order to ensure the accuracy of the reported information, it is important that all reporting carriers have guidance from the FCC in the form of proscribed, set, technical standards for the reporting of the information.

As the current reporting of Form 477 data illustrates, merely allowing carriers to report areas where they are advertising broadband services often leads to some carriers overstating the areas where they can actually provide broadband service within ten business days of a customer's request. Therefore, it is important that the FCC base its new data collection and reporting on technical standards that will help to ensure that a carrier can provide the broadband services, at the speed the carrier claims it offers the service, to the customer locations that the carrier is reporting.

GVNW believes that a carrier, when reporting the locations where the carrier can provide broadband service at a particular speed, should base that reporting on its network design and standard engineering specifications and the type of technology the carrier is using to provide the broadband service [i.e. DSL, Fiber, Fixed-Wireless, or Satellite]. The technical standard would

include loop length, the capacity of the network and any middle mile, the capacity within the spectrum and backhaul, and the distances from a tower.

By using network design and standard engineering specifications to review the ability of a network to provide broadband service to customer locations prior to reporting the information, carriers would lessen the possibility of overstating their broadband service coverage. Thus, carriers would ensure that the information reported under this new collection method using polygon-based mapping data is more accurate.

B. A Challenge Process Is Needed To Ensure Accuracy And Verification.

While it is important that presubscribed technical standards be used to help to ensure the accuracy of the new polygon-based data reporting, it is also important that carriers have the ability through a set process to challenge another carrier's reporting of broadband service in their service area when it might affect their high cost support.

GVNW supports having a challenge process similar to what the FCC has used previously to allow a carrier to provide a response to believed errors in broadband service reporting that could have a potential effect on a carrier's high cost support. A challenge process will provide a necessary check and verification of the accuracy of broadband service reported by a carrier by another carrier that could be done before any decision on the reduction of high cost support is made to the service area of the challenging carrier. Such a challenge would require a carrier to provide supporting documentation that provides clear and convincing evidence that the reported broadband service for that particular area is inaccurate.

C. Input From The Public Or A Government Entity That Disputes A Carriers' Reported Broadband Service Coverage is a two-edged sword.

GVNW believes that allowing public review and dispute of the reported broadband coverage of a carrier can be a “double-edged sword” in that the crowdsourcing can provide good feedback regarding a carrier’s ability or inability to provide broadband service in an area but also could provide faulty feedback at times as well.

The public’s personal experience with broadband service offered by a carrier in a particular area or location can provide important feedback to how the service actually performs and whether it performs at the speed that the carrier is reporting under the new polygon-data based mapping. However, in some cases an individual’s experience where the service at a particular location is not performing at the speed reported by the carriers for its broadband service would not necessarily be due to the carrier’s network being unable provide that level of service. For example, an individual who experiences broadband service that does not meet the speeds that the carrier is reporting for an area or location may not fully be taking into consideration the number of devices in use at that location concurrently, which may be the actual cause for the slower broadband service.

In addition, the opportunity for public input can lead to disgruntled individuals or unscrupulous competitors leaving bad reviews about a carrier’s broadband service for no reason other than to damage the carrier. Examples of this type of crowdsource feedback include internet sites where in some cases individuals provide bad reviews online for a restaurant that they have not actually eaten food.

With the possibility of either inaccurate public disputes or intentional bad faith public disputes of a carrier’s reported broadband service data, it is important that there is a process for a carrier to respond to a dispute if it chooses to do so to provide evidence of its ability to provide the broadband service as reported. This would allow the carrier to have the public dispute removed

from the system if it can show that the dispute is not accurate. GVNW believes that this could be a simple and straightforward process with the carrier providing a written response with supporting documentation showing why the public dispute is not accurate.

GVNW also believes that with the opportunity for carriers to choose to respond to a public dispute of its reported broadband service offering that are inaccurate, that any additional updates by a carrier to its broadband service reporting following crowdsourcing input more than semiannually would be overly burdensome on carriers.

D. Latency Could Be Reported Along With The New Data Collection.

The *Notice* seeks comment on whether fixed broadband providers should include latency levels along with the other parameters in reporting their coverage polygons. GVNW believes that latency should be included in the polygon-based reporting because it provides an important element in determining whether the broadband service is at a speed and quality that is useful to consumers. For example, consumers using online video services, gaming, or other internet-based applications, are dependent on having broadband service with low latency to function correctly without streaming delays.

GVNW believes that carriers could incorporate latency information in the polygon-based data reporting along with location-based reporting, so that the mapping used could provide all the information at the same time. Further, carriers could indicate that the broadband service they provide is low latency and is comparable to the low latency standard set for CAF Phase II support of ≤ 100 ms or if a carrier chooses to do so, they could provide a more specific low latency result when reporting.

E. A Sunset On Form 477 Data Reporting Should Only Be Done When The New Collection Method And Portal Has Shown Provable Reliability And Has Been Thoroughly Tested.

GVNW supports any effort by the FCC to improve the accuracy of the Form 477 data reporting by carriers while USAC creates a new portal for the new collection method using polygon-based data. However, GVNW believes that 477 data should continue to be improved and carriers should continue to report the data, until such time when the new collection portal and the polygon-based data reporting has shown provable reliability and has been thoroughly tested.

It would be premature for the FCC to set a sunset on the reporting of Form 477 data at this time or before the new collection method and portal have shown proven reliability and have been thoroughly tested.

F. A Location-Based Process For Fixed Broadband Deployment Reporting Could Run Parallel Or Closely Aligned With The Portal That Is Being Created.

GVNW believes that along with the establishment of the new online portal for the Digital Opportunity Data Collection using the polygon-based mapping for reporting, the FCC could establish a location-based fixed broadband deployment reporting process that could run parallel, or closely aligned with a newly established portal for the reporting of broadband service offerings using polygon-based data.

While this extra reporting would cause the carriers additional time and cost, the industry is moving in the direction of carriers being able to identify the locations in their area that they provide broadband service to and the speeds that they provide with that service. Therefore, a process for a carrier's location-based reporting could run parallel to the reporting for the new polygon-based reporting, and closely aligned with the portal being created for that filing.

The timing for a process of reporting location-based data could run parallel to the polygon-based reporting and on the same timeframe.

III. CONCLUSION

For the reasons set forth herein, GVNW supports the FCC's efforts to enhance the accuracy and usefulness of broadband deployment reporting and the identification of locations that have and do not have broadband service using a polygon-based data format. GVNW believes that it is essential that the information that is collected and reported be based on set technical standards, be accurate, and subject to a validation or challenge process to ensure its accuracy. Further, GVNW believes crowdsourcing can provide valuable input as well as faulty information. Therefore, carriers should have the ability to choose to respond to a crowdsourced dispute relating to the broadband service it has reported. GVNW believes that carriers can provide latency reporting along with the polygon-based data reporting. Lastly, a process for location-based reporting could run parallel to the polygon-based reporting, closely aligned with the portal that is being created by USAC.

Respectfully submitted,
By: /s/ Jeffry H. Smith
Jeffry H. Smith
President and CEO

Steve Gatto
Regulatory Manager