

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of	)	
	)	
Procedures to Identify and Resolve Location	)	WC Docket No. 10-90
Discrepancies in Eligible Census Blocks	)	
Within Winning Bid Areas	)	
	)	

**REPLY COMMENTS OF CALIFORNIA INTERNET, L.P. DBA GEOLINKS**

California Internet, L.P. DBA GeoLinks (“GeoLinks” or the “Company”) submits these reply comments in response to comments filed on the Public Notice released by the Wireline Competition Bureau (“Bureau”) regarding procedures to identify and resolve location discrepancies in eligible census blocks within Connect America Fund Phase II (“CAF II”) winning bid areas on September 10, 2018.<sup>1</sup>

**I. INTRODUCTION**

Several commenters in the aforementioned proceeding share GeoLinks’ view that the Bureau should create a straightforward process for resolving location discrepancies that may exist in Phase II auction support areas. GeoLinks believes that such a process is necessary to ensure that CAF II recipients and relevant stakeholders are able to gather and report accurate location-specific data. As such, GeoLinks makes the following recommendations.

**II. DISCUSSION**

***A. Prospective Developments***

In the Public Notice, the Commission asks whether “actual locations should include prospective developments that have a reasonable certainty of coming into existence within the

---

<sup>1</sup> Public Notice, “Wireline Competition Bureau Seeks Comment on Procedures to Identify and Resolve Location Discrepancies in Eligible Census Blocks Within Winning Bid Areas,” WC Docket No. 10-90, DA 18-929 (rel. Sept. 10, 2018) (“Public Notice”).

support term.”<sup>2</sup> GeoLinks agrees with commenters that ask the Commission not to require CAF II recipients to include prospective developments into the definition of “actual location.”

In both California and Nevada, the states for which GeoLinks has been awarded CAF II funding, there have been many instances where housing developments have been planned, or even started, but then downsized, abandoned, or put on indefinite hold. While many of these developments do eventually get built, as WISPA notes, there is no guarantee that information regarding new developments will stay constant past the one-year period of determining “locations” or that those plans won’t be modified to increase or decrease the number of housing units, small businesses, etc.<sup>3</sup> As USTelecom explains, “Providers cannot be omnipresent in local real estate planning over the next year and auditing whether a provider could have, or should have, known about a prospective development would be extremely subjective.”<sup>4</sup> Moreover, other commenters advocate for the Bureau to “permit support recipients to rely on any reasonably current data source” and to avoid “imposing evidentiary burdens beyond those that are strictly necessary.”<sup>5</sup>

For these reasons, GeoLinks urges the Bureau not to *require* that prospective developments be included in the definition of “actual location.” However, if a CAF II recipient chooses to include prospective developments in its definition of actual locations, GeoLinks agrees with WISPA that it should be allowed to do so if it can provide information to show that specific prospective locations are more likely than not to be constructed and inhabited within the six-year buildout period.<sup>6</sup>

### ***B. Reliability and Validity of Data***

In its opening comments, GeoLinks urged the Bureau not to limit broadband providers’ ability to determine what methodology may work best for them to gather information regarding

---

<sup>2</sup> Public Notice at 5.

<sup>3</sup> See Comments of the Wireless Internet Service Providers Association, WC Docket 10-90 (filed Oct 29, 2018) (“WISPA Comments”) at 3.

<sup>4</sup> Comments of USTelecom, WC Docket 10-90 (filed Oct. 29, 2018) (“USTelecom Comments”) at 3.

<sup>5</sup> Comments of Verizon, WC Docket 10-90 (filed Oct. 29, 2018) (“Verizon Comments”) at 5 and Comments of Hughes Network Systems, WC Docket 10-90 (filed Oct. 29, 2018) (“Hughes Comments”) at 2, respectively.

<sup>6</sup> WISPA Comments at 3.

the number of locations within an area so long as the provider can explain that methodology. This sentiment was echoed by several commenters that offered numerous proposals beyond those methodologies that the Public Notice called “generally accepted.”<sup>7</sup>

US Telecom suggests that providers should be able to rely upon desktop geolocation or automated address geocoding.<sup>8</sup> WISPA discusses the possibility of aerial imagery (which GeoLinks also suggested in its opening comments) in addition to the possibility of combining the findings from desktop geolocation using web-based maps and imagery with other qualitative criteria such as roof size or other visual evidence.<sup>9</sup> Verizon suggests refining initial analysis with web-based maps or targeted GPS data in the field.<sup>10</sup> Hughes urges the Bureau to allow recipients to utilize third-party geocoding providers.<sup>11</sup> Moreover, Commnet, explains that any process to collect required location-specific showings “must account for areas such Tribal Lands where standard street addresses are not available and commercial geocoding data are scant and unreliable.”<sup>12</sup>

GeoLinks believes that the proposal of many different options makes clear that there are many ways for CAF II recipients to verify location data. So long as a CAF recipient’s selected methodology (or methodologies) can be explained, it should not be precluded from using any reasonable method. Therefore, GeoLinks continues to urge the Bureau not to limit available methodologies to verify location data.

### ***C. Relevant Stakeholder’s Evidence***

With respect to the definition of “relevant stakeholders,” GeoLinks strongly agrees with WISPA that this definition should be limited to individuals, state and local authorities, and Tribal governments, in the relevant supported area.<sup>13</sup> Additionally, GeoLinks strongly agrees that “the evidence submitted by stakeholders should be the same as is required to be submitted by

---

<sup>7</sup> See Public Notice at 11.

<sup>8</sup> USTelecom Comments at 4.

<sup>9</sup> WISPA Comments at 4-5.

<sup>10</sup> Verizon Comments at 3,

<sup>11</sup> Hughes Comments at 3

Comments of Commnet Wireless, Inc., WC Docket 10-90 (filed Oct. 29, 2018) at 2.

<sup>13</sup> See WISPA Comments at 6. See also USTelecom comments at 5.

participants.”<sup>14</sup> Both GeoLinks and WISPA urge the Bureau to require relevant stakeholders to submit a narrative description of the methodology they used to challenge the location information provided by a CAF II recipient and to certify under penalty of perjury that 1) the location data they are providing is accurate, 2) the stakeholder is located (or represent individuals that are located) within the relevant geographic area, and 3) that the stakeholder is not associated in any way with a competitor.<sup>15</sup> As WISPA explains, “it should not be sufficient for a stakeholder to solely *allege* deficiencies in the participant’s methodology.”<sup>16</sup>

### III. CONCLUSION

Based on the foregoing, GeoLinks urges the Bureau to adopt the recommendations discussed herein, as agreed to by several parties to this proceeding, regarding procedures to identify and resolve location discrepancies in eligible census blocks within CAF II winning bid areas.

Respectfully submitted,

**GEOLINKS, LLC**

/s/ Skyler Ditchfield, Chief Executive Officer

/s/ Melissa Slawson, General Counsel/ V.P of Government  
Affairs and Education

November 13, 2018

---

<sup>14</sup> WISPA Comments at 7.

<sup>15</sup> *See* WISPA Comments at 6.

<sup>16</sup> WISPA Comments at 7 (*emphasis added*).