



November 9, 2017

Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Re: WC Docket No. 11-10

Dear Commissioners:

The Galena Territory Association is the common interest community association that manages the 1,900 acres of common properties collectively owned by the 4,093 members in the Galena Territory, 6,800 acres located in rural northwest Illinois. Our recent owner survey reveals that 33% of our members currently need faster internet access service than they are able to get, and 35% need more dependable service. We are currently served by a large national wireline telecommunications provider who only offers dial-up internet service, a large national cable provider with adequate broadband service but serving only about half of the Territory, and a few fixed wireless providers with service available in some locations. Our Territory is very hilly and not densely populated which poses additional challenges to obtaining reliable and fast broadband access – which we need for our current and future livelihood.

We wish to echo the comments of the very few consumers that have commented in this docket (in particular, the comments of Brett Ferguson from Elgin, TX). According to the FCC website, the current form 477 data shows that virtually all addresses in the Territory are served by multiple providers of broadband service offering 25MB/second download and 3MB/second upload speeds. We understand that current regulations report broadband availability for the entire Census Block Group (CBG) on the basis of availability to at least one location within the CBG. Our CBGs are relatively large geographic areas and we know that far less than 100% currently have broadband available. **More granular data is required if the FCC is to ensure that advanced services are being deployed in a timely fashion to all Americans.**

Not only is the CBG level data inadequate, but the FCC website also reports that 100% of locations have access and it is not clear what the percentages apply to. For examples, CBGs 170850204011065 and 170850204011015 both show multiple providers and 100% availability of 25/3 service but we have a significant number of owners in those CBGs that do not have cable service available and are in locations that reliable fixed wireless service cannot reach. Even satellite service is not reliable in some locations. Our owners also do not find wireless and satellite internet service to be adequate for their present, let alone future, internet access needs.

As discussed in Mr. Ferguson's submission, these unserved addresses are not eligible for Connect America Fund support due to the lack of granularity in the mapped data. Both our cable provider and our local electric cooperative have interest in expanding fiber access in our area, but construction costs

are high due to the terrain and low population density. More granular data would permit support to be targeted to unserved locations and provide the Commission with a more accurate view of exactly how many rural areas truly have adequate broadband access.

We understand that more granular data collection imposes costs on broadband providers, but we urge you to consider the needs of consumers as well as these providers. Our current providers do not have the incentive to represent our needs and too few rural consumers are represented in this proceeding. Please consider rectifying this imbalance in the current record, and ensure that future data is collected that accurately reveals broadband availability in rural areas.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mark Klausner", with a stylized, flowing script.

Mark Klausner, President  
Board of Directors

Sincerely,

A handwritten signature in blue ink, appearing to read "Joe Mattingley", with a stylized, flowing script.

Joe Mattingley  
General Manager

1109 FM 3000  
Elgin, TX 78621

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