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|  | Federal Communications Commission  Washington, D.C. 20554 |

December 31, 2018

**VIA ECFS ELECTRONIC DELIVERY**

Ms. Marlene H. Dortch, Secretary

Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554  
  
Re: Measuring Broadband America Program (Fixed Collaborative), GN Docket No. 12-264  
  
Dear Ms. Dortch,  
  
On October 31, 2018, Members of the Commission Staff met with representatives of broadband providers, public interest groups, companies, and other organizations for a collaborative meeting to discuss plans pertaining to the fixed Measuring Broadband America (MBA) program.[[1]](#footnote-1)

Walter Johnston, Chief, EMCD/OET welcomed all the collaborative members and proceeded with a roll call of all the participants in the room as well as those on the teleconference bridge. He then introduced Ms. Roxanne Robinson, Global Head of Client Services at SamKnows to present the agenda for the meeting.[[2]](#footnote-2)

1. **MBA Report 7th (2017) and 8th (2018) Status Update:**

Mr. Johnston informed the collaborative that there had been significant decisions made by the Commission with respect to the MBA Reports. Title IV of RAY BAUM’S Act of 2018 directs the Commission to publish in the last quarter of every even-numbered year a comprehensive evaluation of the state of the communications marketplace in the United States. Rather than have each Bureau issue a separate Competitive report, the Commission made a decision to consolidate all the Bureau reports (including Wireline and Wireless Bureaus) into one single Communications Marketplace Report. The OET was asked to work with the Wireline bureau to include its set of MBA Reports (7th and 8th MBA Reports) as part of the Appendix to this consolidated report. A choice was to either to include the MBA reports as either two separate reports or as one consolidated report. Mr. Johnston expressed his preference to have the two reports be kept separate since creation of a consolidated report would require considerably more effort and time.

In addition to the reports which would be included in the Appendix, a short (one and a half page) summary would also be included in the main body of the consolidated Wireline Competition Report. In response to questions regarding the nature of this summary, Mr. Johnston pointed out that the summary was meant to discuss generalities about the program and not to make any definitive statements about ISP performance.

Mr. Johnston also reminded the Commission that it needed some extra time to be provided so that ISPs have a chance to look at the two reports and provide feedback before the reports are released to the general public. Mr. Johnston pointed out that in addition to having the two reports published as a part of the consolidated Wireline Competitive Report, they would also be published, as usual, on the FCC’s Measuring Broadband America (MBA) site within 30 days of the release of the Reports.

1. **Early data release:**

In previous meetings an effort had been made to have the data released before the release of the MBA Reports. Considering the fact that it was almost November and the Report was to be issued in December, there didn’t seem much point any longer in pursuing early release of data. Instead, a decision was made to have the data released soon after the Reports were published on the MBA site.

1. **MBA 2016:**

A number of ISPs had contacted Ms. Robinson and the FCC questioning the set of dates used for validating the 2016 MBA Report. As per the 2016 MBA Report the validated dates were September 29-30, October 2-7 and October 10-31 inclusive. However, the data set seemed to include dates outside this, i.e. September 4-6, Sept10, Sept 12-15 and September 21-28. Sam Knows reviewed the data and concluded that it had actually used 46 days of data instead of trimming the set of dates to the normal 30 days of data for validation purposes. Ms. Roxanne noted that all the dates were acceptable dates, i.e. these dates were outside the period when there were storms or added traffic such as IoS release. A review on the impact of the results by SamKnows showed an approximate 0.1% effect on average. In response to questions regarding the effect for specific ISP tiers, SamKnows agreed to study the effect on individual download tiers of all the ISPs to check if a few specific tiers might have been unduly affected. This will be presented at the next meeting. The FCC also promised to issue an errata to the MBA 2016 report to update the list of dates that were reported on.

1. **Date selection for the 9th MBA report (2019):**

In deciding the set of dates to be used for the 9th MBA Report, Ms. Robinson mentioned that the final review of dates would occur once the reporting period was complete. Historically the validation dates have been chosen from dates in September and August. SamKnows pointed that there is need to evaluate the effects of the new iOS release as well as the effects of hurricanes Florence and Michaels. Additionally, any validations or tier changes flagged by the ISPs need to be accounted. As a precaution it was decided to extend the reporting month to November in the event that there might not be enough acceptable dates in September and October to get a 30 day validation period. The final validation dates will be shared at the next collaborative meeting on Thursday, 29th November.

SamKnows informed the collaborative that it had done some preliminary high-level analysis of the impact of Hurricanes Florence and Michael. With respect to the effect of Hurricane Florence there was a slight dip in the number of whiteboxes reporting data for the time period of 13-19 September when the hurricane hit the shores of North Carolina. However, this dip in number of whiteboxes reporting did not result in any significant effect on the measured download speeds for those days. There was also a slight drop in the number of whiteboxes reporting data in Florida and Georgia between October 10 to 14 due to hurricane Michaels. Once again there was no appreciable drop in the download speeds in Florida and Georgia for that time period. SamKnows requested the ISPs to let them know if they had any other information or concerns that might affect the reporting dates.

1. **Automated Validations:**

Ms. Robinson reintroduced the subject of automating the validation process for those ISPs or participants who may have joined more recently and were not aware of this initiative by SamKnows. Ms. Robinson was happy to report that so far one ISP had already completed the automated validation procedure and that another was in the process of doing so. Mr. Johnston recommended ISPs to invest in this process since it would circumvent the need for them to have to hire personnel to do the job of post validations of panelist service tiers.

Mr. Johnston concluded the meeting by thanking all the attendees for their active participation. He expected that not all the participants may be available to attend the last meeting of the MBA on December 20, and consequently wished everyone a wonderful holiday season and a happy new year.

Sincerely,  
  
/s/ Rajender Razdan  
  
Rajender Razdan, Electronics Engineer,  
Electromagnetic Compatibility Division/OET  
Federal Communications Commission

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1. A list of attendees is attached to this filing in GN Docket No. 12-264. [↑](#footnote-ref-1)
2. SamKnows presentation is attached to this filing in GN Docket No. 12-264. [↑](#footnote-ref-2)