

Eric N. Einhorn  
V.P. Federal Government Affairs  
Windstream Communications, Inc.  
1155 15<sup>th</sup> Street, N.W., Suite 1002  
Washington, DC 20005

(202) 223-7668  
eric.n.einhorn@windstream.com



January 8, 2008

**Electronic Filing**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: ***Ex Parte***

WC Docket No. 07-38, Development of Nationwide Broadband Data to Evaluate Reasonable and Timely Deployment of Advanced Services to All Americans, Improvement of Wireless Broadband Subscriberhip Data, and Development of Data on Interconnected Voice over Internet Protocol Subscriberhip

Dear Ms. Dortch:

Today Jennie Chandra, Director – Federal Regulatory Affairs, and I met with Ian Dillner, Legal Advisor to Chairman Kevin Martin to discuss Windstream’s position on broadband reporting in the above-referenced docket. Discussion in the meeting was consistent with the attached, which we presented to Mr. Dillner.

Please feel free to contact me if you require additional information.

Sincerely,

A handwritten signature in black ink, appearing to be "Eric N. Einhorn", written over a horizontal line.

Eric N. Einhorn

cc (by e-mail): Ian Dillner



**FORM 477 – CENSUS TRACTS AS A BASIS FOR MEASURING BROADBAND PENETRATION**

**REPORTING BROADBAND DATA BY CENSUS TRACT IS PREFERABLE TO ZIP+4.**

---

**What is a census tract?**

A census tract is a common reporting unit for the U.S. Census Bureau. It is a small, relatively permanent statistical subdivision of a county. A census tract generally contains between 1,500 and 8,000 people, with an optimum size of 4,000 people.

**Why is reporting by census tracts preferable to reporting by ZIP+4?**

**1. Ability to correlate broadband data with demographic information**

Any broadband data collected on a census tract basis easily can be correlated with U.S. Census demographic information on topics including, but not limited to, age, gender, race, education, and income.

In contrast, data based upon 9-digit ZIP codes cannot be directly correlated with demographic information collected in the U.S. Census. Specifically, there is no correlation between 9-digit ZIP codes and U.S. Census geography. Moreover, the U.S. Census Bureau does not offer crosswalk or relationship files that associate 9-digit ZIP Codes with U.S. Census data.

**2. Capacity to be mapped**

A census tract is a bounded geographic unit that nests within a single county. Unlike census tracts, 9-digit ZIP codes are not and never have been spatial entities. 9-digit ZIP codes are simply categories for grouping mailing addresses. For example, a 9-digit ZIP code may merely designate a single apartment building, an individual high-volume receiver of mail, or an isolated post office box.

**3. Little variation over time**

Census tracts are relatively stable over time. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of decennial census data. Census tracts were designed to be relatively homogeneous units with respect to population characteristics, economic status, and living conditions. The U.S. Census Bureau modifies census tracts, at most, only once every ten years.

In contrast, the U.S. Postal Service's list of 9-digit ZIP codes is updated monthly. 9-digit ZIP codes are designed to meet the day-to-day operational needs of the U.S. Postal Service – not to track demographic information.