

July 24, 2012

Via Electronic Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: *Ex Parte* Letter, CG Docket No. 09-158, CC Docket No. 98-170, WC Docket No. 04-36

Measurement Lab (M-Lab) submits the following draft framework for the instantiation of an FCC Measurement Program Technical Advisory Committee. This follows a meeting July 20, 2012, during which Chief Technologist Henning Schulzrinne and M-Lab representatives discussed the formation of this committee, and its role in the existing measurement program.

FCC Measurement Program Technical Advisory Committee, Draft Framework

The Measurement Program Technical Advisory Committee (TAC) will comprise an IETF-style working group tasked with advising the broader measurement collaborative on the technical quality and openness of the FCC's broadband measurement efforts. The committee will focus on the following:

- Test specifications
- Statistical and analytical methodologies
- Open data publication
- Infrastructure

The committee will devise technically specific recommendations that promote open, transparent measurement. Recommendations made by the TAC will adhere to and build on the openness principals committed to by the measurement program. Open, transparent measurement in the context of the FCC's measurement program should adhere to the following principles:

1. All network data collected is released publicly, in its raw, non-aggregated form, no later than one year after its collection date.
2. The tests used to measure the network are open-source, allowing the methodology used in measurement to be vetted and improved by collective scientific insight.
3. The measurement infrastructure on which the tests run is openly documented, consistently run, and independently managed by the research community.
4. The analytic and statistical methodologies applied to the raw data in the production of a published report are released openly, allowing peer review and

replication of results by independent researchers.

5. The program makes commitments to operational openness that explicitly includes participants from the research and public interest community.

All recommendations must be backed by a technical rationale that includes (1) the reasoning applied to arrive at a recommendation, (2) the exact technical specification of the recommendation itself, in a form that can be implemented, and (3) the way in which the recommendation will further open, transparent measurement, per the principles outlined above.

The group will be limited to those with a technical and engineering background. Members will be elected from the research community and among technical leaders within industry. Membership of the committee will be announced during an upcoming collaborative meeting, and the relationship between the TAC and the broader collaborative will be instantiated in a charter document published at that time. We recommend that Henning Schulzrinne stand as the chairman of the TAC.

The group will meet regularly (once a month or more), and discussions will take place between meetings over a mailing list open to all members, and submitted to the public record.

A suggested list of tasks, to be addressed by the TAC with the motive of issuing implementation recommendations to the broader collaborative, are as follows, in order:

1. Review testing methodologies and develop an open specification for all measurements conducted by SamKnows as a part of the FCC measurement program. These open specifications should provide observers a clear view of the way in which specific measurements are achieved. These must be comprehensive enough to allow for third-party implementation that achieves the same results collected and published by SamKnows as a part of the measurement program. These open specifications will be in the keeping of the TAC for the duration of the program, and will be reviewed and updated as SamKnows evolves its tests and methodologies, and in response to feedback from the research community and the public.
2. Review analytic and statistical methodologies, and ensure that the methods applied to the raw SamKnows data to achieve the results published in the Measuring Broadband America reports are robust and complete, enabling third party replication of all published results from open, published data.
3. Review the currently published SamKnows data and ensure that choices made in presentation, format, and any pre-publication aggregation follow standards that ensure the data remain useful, intelligible, and that results achieved and published using the data can be replicated by a third party without undue effort.

Beyond the specified task list, the TAC will be responsible for resolving technical debates that arise within the larger collaborative. The TAC will continue its role as long as the measurement program is continued.

Respectfully submitted,
/s/

Sascha Meinrath

Open Technology Institute
New America Foundation
1899 L Street NW, Suite 400
Washington, DC 20036

Cc: Chief Technologist Henning Schulzrinne