



Federal Communications Commission
Washington, D.C. 20554

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JUL 27 2012

Federal Communications Commission
Office of the Secretary

July 26, 2012

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Consumer Information and Disclosure Public Notice CG Docket No. 09-158, CC Docket No. 98-170, WC Docket No. 04-36

Dear Ms. Dortch:

On July 25, 2012, representatives of broadband providers, public interest groups, companies, and other organizations met with Commission staff (Henning Schulzrinne, Commission Chief Technology Officer; Daniel Kirschner, Counsel to the General Counsel; Walter Johnston, Chief Electromagnetic Compatibility Division (EMCD) and James Miller, Senior Attorney Advisor in EMCD) to discuss the Commission's 2012 broadband measurement and performance program.

The meeting discussed the need to maintain the openness and transparency in the program and concerns that were raised in an open letter from members of the Internet community to the FCC. Henning Schulzrinne summarized the ongoing principles and commitments to openness, transparency, and collaboration that have led to the success of the program. He noted that the Commission, broadband providers, and other participants in the broadband measurement and performance program had consistently adhered to these principles. He suggested that in order to enable a better understanding, particularly by the public, of the Commission's commitment to openness, transparency, and sound scientific research, a more detailed description of these principles might be useful. He provided an overview of a first discussion draft (attached as Appendix A) reflecting these principles.

The group discussed the need to improve the overall reliability of the data collection system. One approach that was suggested was the use of redundancy in the measurement platform as a possible means to achieve this. The *Measuring Broadband America* report uses similar months each year to allow important longitudinal year-by-year analysis of data, unaffected by seasonal variations. Staff emphasized that comparisons may be less reliable if data for the chosen measurement months becomes unusable. In addition, there is a need to have the capability to rapidly detect problems while the data is being collected rather than only after it has been analyzed.

Commission staff noted that perfect reliability in any single large-scale measurement infrastructure is an unattainable goal. Commission staff also noted that it had requested SamKnows to prepare a draft paper to facilitate dialogue on appropriate technical hardware, connectivity, and management standards for open measurement servers that could be added to the program to create redundancy and increase overall reliability in case of failures in parts of the infrastructure. This paper was subsequently distributed to ISPs and all others associated with

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this project for feedback. In particular, this document had raised for discussion technical issues involved in pairing on-net servers (possibly provided by ISPs) with independent off-net servers, provided by M-Lab, as a mechanism for achieving redundancy and thus addressing possible loss of data. Such on-net servers, if a decision was made to use them, would need to meet specifications provided by SamKnows in their draft paper and use data collection software managed by SamKnows.

Measurement Lab (M-Lab) representatives stated that they were ready to work with the Commission on program improvements while ensuring that the principles of openness and transparency were preserved. Staff expressed appreciation for M-Lab's valuable contributions to the program, noted the importance of M-Lab's continued participation and support of the program, and stated that any additional features are intended only to complement and not replace or undermine the data collected through M-Lab.

Commission staff emphasized that any improvements to the measurement process must fully support the Commission's goals for openness and transparency and meet other scientific criteria necessary for the program.

The group discussed plans for the next meeting in two weeks to resolve pending concerns and focus discussion of preparations for the September 2012 measurement process and second 2012 report.

Sincerely,

A handwritten signature in black ink, appearing to read "Walter Johnston". The signature is fluid and cursive, with the first name "Walter" and last name "Johnston" clearly distinguishable.

Walter Johnston, Chief
Electromagnetic Compatibility Division/OET

Attendees

Name	Organization
Jim Smith	AT&T
Ladonna Hagler	AT&T
Mike Pfau	AT&T
Tom Anschutz	AT&T
Paul Jamieson	Cablevision
Jeb Benedict	Centurylink
Mary Retka	Centurylink
Michael Bugenhagen	Centurylink
Carl Leuschner	Charter
Marc Linsner	Cisco
Russ Gyurek	Cisco
Chae Chung	Comcast
David Don	Comcast
Mary McManus	Comcast
Anita Dear	Cox
Ony Anglade	Cox
Paul Cain	Cox
Alec Macdonell	FCC
Dan Chen	FCC
Deborah Broderson	FCC
Walter Johnston	FCC
Daniel Kirschner	FCC
James Miller	FCC
Mustafa Naseem	FCC
Henning Schulzrinne	FCC
Mike Saperstein	Frontier
Meredith Whittaker	Google/M-Lab
Mat Ford	ISOC
Dave Rerko	JDSU
Steve Morris	NCTA
Jim Partridge	NCTA
Thomas Gideon	New America Foundation/M-Lab
Alex Salter	SamKnows
Rachel Neish	SamKnows
Sam Crawford	SamKnows
Sophie Deen	SamKnows
Jason Weil	Timewarner Cable
Terri Natoli	Timewarner Cable
Glenn Reynolds	US Telecom
Chris Martin	Verizon
David Young	Verizon
Donna Epps	Verizon
Kitty O'Hara	Verizon
Mark Montano	Verizon

Tamera Graves
Malena Barzilai

Verizon
Windstream

Appendix A