

August 24th, 2012

Via Electronic Filing

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

Re: Notice of Oral Ex Parte Communications, CG Docket No. 09-158, CC Docket No. 98-170, WC Docket No. 04-36

Dear Ms. Dortch:

As members of the research and academic community involved with the FCC's Measuring Broadband America (MBA) effort, we wholeheartedly appreciate the Commission's willingness to actively collaborate with the scientific community and integrate principles of sound scientific process into the MBA program.

Recently we have worked with the MBA program's Standards Group. Over the week of August 20, 2012, the group worked to prepare a submission to the Broadband Forum (BBF), intended to inform BBF's effort to create a broadly useful measurement architecture standard. Under a tight deadline, the Commission ensured that feedback and concerns from the research community and other stakeholders were heard, understood, and reflected in the final draft sent to BBF. We have attached this draft for convenient reference.

Specifically we would like to commend the Commission's commitment to scientifically-verifiable open measurement, enumerated as a program requirement in the final submission to BBF. The fact that the requirements highlighted in this document around open, transparent measurement reflect those of the broader scientific community is a product of the FCC's dedication to including the research and academic community.

It is imperative that broadband policy be formed on a foundation of verifiable, open, scientifically sound data. For this to happen, an open and active collaboration between the policy and the research communities must serve as the compass guiding the collection and analysis of such data. We support the Commission's commitment to these principles, and we look forward to working actively within this program as it grows and develops.

Respectfully submitted,

/s/

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