

March 11, 2013

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Modernizing the Form 477 Data Program, WC Docket No. 11-10
Development of Nationwide Broadband Data, WC Docket No. 07-38
Data Gathering, WC Docket No. 08-190
Review of Wireline Competition Bureau Data Practices, WC Docket No. 10-132**

Dear Ms. Dortch:

On March 8, 2013, Ross Lieberman of the American Cable Association (ACA), Joshua Guyan of Kelley Drye & Warren (on behalf of ACA), Steve Morris of the National Cable & Telecommunications Association, Michael Romano and Richard Schadelbauer of NTCA, and Glenn Reynolds of USTelecom (collectively the Associations), met with Julie Veach, Ellen Burton, Chelsea Fallon, Lisa Gelb, Travis Litman, and Steve Rosenberg of the Wireline Competition Bureau and Susan Singer of the Wireless Telecommunications Bureau, to discuss the following issues in connection with the pending Notice of Proposed Rulemaking in the above-referenced dockets:

Subscription Data. The Associations raised questions regarding the submission of subscription data on the basis of census blocks, which would be substantially more burdensome than the current requirement to submit such data on the basis of census tracts. We expressed interest in further discussions regarding the Commission's concept of creating an "app" that would facilitate the ability of companies to convert billing system data to the format and granularity the Commission would require. We pointed out that the use of such an app would affect the ability of companies to certify as to the accuracy of the data that is submitted on the Form 477. We also strongly encouraged the Commission not to change the current rules until such an app could be created and tested to ensure that the rule change did not unduly burden broadband providers. More generally, we encouraged the Commission to seek public comment on a revised version of the Form 477 so that broadband providers could review and comment on all the changes the Commission is considering.

Availability Data. With respect to the collection of availability data, the Associations explained that transitioning from the current voluntary regime, which is operated by state mapping entities that are under contract to NTIA, to a mandatory system operated and administered by the Commission would require a significant transition for the thousands of broadband providers that would be required to submit data. We encouraged the Commission to provide affected parties with notice and an opportunity to comment on the specific data that will be required and the process for submitting that data to the Commission.

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Speed Tiers. The Associations expressed general support for the concept of revising and simplifying the speed tiers that are used on the Form 477 and for including tiers that are used in connection with the universal service program. We explained, however, that the speed tiers that broadband providers offer to their customers change frequently and are not based on the tiers used in the Form 477 process, so that reducing the number of tiers may not materially reduce the burden of mapping actual tiers to the tiers used on the Form 477.

Respectfully submitted,

/s/ Steven F. Morris

Steven F. Morris

cc: Julie Veach
Ellen Burton
Chelsea Fallon
Lisa Gelb
Travis Litman
Steve Rosenberg
Susan Singer