



June 14, 2013

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

***Ex Parte Notice***

***Re: Modernizing the FCC Form 477 Data Program, WC Docket No. 11-10; 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 (VoIP) Subscriberhip, WC Docket No. 07-38; Service Quality, Customer Satisfaction, Infrastructure and Operating Data Gathering, WC Docket No. 08-190; Review of Wireline Competition Bureau Data Practices, WC Docket No. 10-132***

Dear Ms. Dortch:

On June 12, the undersigned and Steve Pastorkovich from NTCA–The Rural Broadband Association, together with Eric Keber and Noah Cherry of the Western Telecommunications Alliance (WTA), participated in a teleconference with Steve Rosenberg, Chelsea Fallon, Lisa Gelb, Carol Simpson and Jamie Susskind of the FCC’s Wireline Competition Bureau, and Paroma Sanyal of the FCC’s Office of Strategic Planning and Policy Analysis.

Call participants sought clarification from FCC staff of proposed changes to the FCC Form 477. Specifically, participants asked how the Commission planned to verify responses submitted on the basis of highest advertised speeds. Participants also asked about how the Commission plans to translate highest advertised speeds into quantifiable speed tiers for purposes of the National Broadband Map.

Finally, participants expressed concern about the reporting burden on smaller carriers, and the possible availability of technical assistance in completing the revised Form 477. Small, rural carriers have limited staffing and financial resources to devote to activities outside of their day-to-day business. Currently, these companies may avail themselves of the assistance of State Broadband Initiative grantees, who facilitate their submission of required Form 477 data. In the absence of this or similar technical assistance in the future, the burden placed upon these carriers may prove overwhelming.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via the Electronic Comment Filing System (ECFS).

Sincerely,

/s/ Richard J. Schadelbauer

Richard J. Schadelbauer  
Economist  
NTCA–The Rural Broadband Association  
4121 Wilson Blvd., Ste. 1000  
Arlington, VA 22203  
703-351-2019

cc: Chelsea Fallon  
Lisa Gelb  
Steve Rosenberg  
Paroma Sanyal  
Carol Simpson  
Jamie Susskind