



June 19, 2013

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

Via Electronic Filing

Re: **Ex-Parte Presentation in:**

WC Dkt. No. 11-10, *Modernizing the FCC Form 477 Data Program*

WC Dkt. No. 07-38, *Development of Nationwide Broadband Data*

WC Dkt. No. 08-190, *Service Quality, Customer Satisfaction and Data Gathering*

WC Dkt. No. 10-132, *Review of Wireline Competition Bureau Data Practices*

WT Dkt. No. 10-131, *Review of Wireless Telecommunications Bureau Data Practices*

WC Dkt. No. 10-175, *Free Press Request to Review Form 477 Data*

Dear Ms. Dortch:

The National Hispanic Media Coalition (NHMC), New America Foundation's Open Technology Institute and the Center for Media Justice (collectively, Public Interest Advocates) respectfully submit this *ex-parte* letter to support modernization of FCC Form 477 data collection and reporting. Specifically, Public Interest Advocates encourage the Commission to:

1. Collect Form 477 data at the more granular census block level. Improving the granularity of the Commission's data was a key recommendation of the National Broadband Plan and Department of Justice. The NTIA collected block-level information for the National Broadband Map, demonstrating the feasibility of this approach;
2. Collect pricing information to facilitate meaningful analysis of marketplace competition. The first recommendation of the National Broadband Plan was for the Commission to "collect, analyze, benchmark and publish detailed, market-by-market information on broadband pricing and competition..."
3. Improve its analysis of Form 477 data, as presented in the semiannual *Internet Access Services* report. Specifically the Commission should utilize Census Bureau demographic data in combination with Form 477 data to provide the public and policymakers with a more granular understanding of broadband access, adoption,

affordability and competition levels within communities of color in census blocks across the nation;

4. Provide the public, or, at the very least, researchers, local governments and Tribal governments, with access to underlying Form 477 data through a searchable and user-friendly database. Enabling outside analysis of Form 477 data was also a key recommendation of the National Broadband Plan;
5. Require providers, if they report offering service in a particular census block, to report whether or not service is offered to all residential premises in that block.

With these modifications the FCC can better meet its stated Form 477 and National Broadband Plan goal to collect data that is “useful for supporting informed policymaking, promoting competition, and protecting consumers.” NPRM at ¶1. Indeed, the aforementioned improvements to Form 477 data collection and analysis will address some of the shortcomings that former FCC Wireline Bureau and Office of Strategic Planning and Analysis chiefs, Sharon Gillette and Paul de Sa, acknowledged in their “Tracking Broadband Data” blog post on February 15, 2010 on Broadband.Gov’s BlogBand, available at <http://blog.broadband.gov/?entryId=166058/>.

Moreover, the measures in this letter will empower researchers, local governments and members of local communities across the nation to understand what is happening in their communities, compare that to what is happening elsewhere, and press their local internet service providers to provide affordable access for everyone.

If the Commission cannot implement the recommendations herein before the public meeting set for later this month, Public Interest Advocates recommend that it pull the item from the agenda.

Public Interest Advocates file this letter pursuant to Section 1.1206(b) of the Commission’s rules, 47 C.F.R. §1.1206(b). Please contact the undersigned should you have any questions.

Respectfully submitted,

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