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June 21, 2013

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

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

WC Docket No. 11-10, *Modernizing the FCC Form 477 Data Program*  
WC Docket No. 07-38, *Development of Nationwide Broadband Data*  
WC Docket No. 08-190, *Service Quality, Customer Satisfaction and Data Gathering*  
WC Docket No. 10-75, *Free Press Request to Review Form 477 Data*  
WC Docket No. 10-132, *Review of Wireline Competition Bureau Data Practices*  
WT Docket No. 10-131, *Review of Wireless Telecommunications Bureau Data Practices*

Dear Ms. Dortch:

On Wednesday, June 19th, I met with Nicholas Degani, Legal Advisor for Wireline issues to Commissioner Pai, regarding the draft Order in the above-captioned dockets, and reiterated Free Press's disappointment with that item. Despite the need for the agency to collect and disseminate better data to facilitate competition analysis, the draft apparently does not adopt the National Broadband Plan and Department of Justice recommendations to do so.

We discussed the concerns outlined in other recent filings in WC Docket No. 11-10, including a Free Press *ex parte* submission filed on June 14th and a Public Interest Spectrum Coalition *ex parte* notification filed on June 17th. I explained that the Commission can and must collect pricing data to inform its analyses – even if it begins to do so on a less granular basis using an approach similar to the Media Bureau's annual pricing survey in the multichannel video market. The Commission also should take definitive steps to make Form 477 data available to researchers, pursuant to appropriate protective orders. And the Commission should increase the granularity of its reporting for deployment and subscription data, not decrease the level of specificity by abandoning the NTIA's road segment methodology for large, rural census blocks.

Respectfully submitted,

/s/ Matthew F. Wood  
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cc: Nicholas Degani