



July 1, 2019

Ex Parte

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

**Re: Modernizing the FCC Form 477 Data Program, WC Docket No. 11-10
Connect America Fund, WC Docket No. 10-90
Rural Digital Opportunities Fund, WC 19-126**

Dear Ms. Dortch:

On June 27, 2019 representatives of the Broadband Mapping Coalition met with Kris Monteith, Steve Rosenberg, Kirk Burgee, and Ken Lynch of the Wireline Bureau and Giulia McHenry of the Office of Economics and Analytics to present some additional findings from the Broadband Mapping Initiative pilot project and address several issues regarding using shapefiles for FCC Form 477 reporting. A list of the attendees is attached.

We reported to Commission staff that an initial version of the Broadband Serviceable Location Fabric (BSLF) has already been completed for Missouri and visual verification and linkage to submitted carrier data is now in process. While location counts could increase slightly after these verification steps, the data is sufficiently robust to begin some comparative analysis.

For purposes of the meeting we compared the BSLF primary structure counts in price cap carrier Connect America Fund (CAF) census blocks in Missouri that contained only residential locations with the housing unit counts in 2011 census bureau data for the same census blocks. The 2011 census bureau data is the same housing unit information incorporated into the Connect America Fund cost model. After the meeting we converted the census housing unit counts to estimated structure counts to provide a normalized comparison of the two datasets that we present in this filing to better illustrate the difference between the BSLF and the housing structures information behind the CAF programs. [See attached graphs]

The analysis found that structure counts per census block in this subset of the BSLF¹ versus 2011 census housing structure data were the same only 36% of the time. We found that over 28.7% of the census blocks have BSLF location counts higher than census 2011 data, while 35.3% had fewer locations than the census data.

Additionally, on an individual census block basis there are over 4,000 census blocks where the BSLF found 100% **more** structures than the 2011 census data and more than 13,000 census blocks where the BSLF structure count was between 81% and 100% **less** than the 2011 census count. The BSLF located between 2 and 100 more structures per census block in over 13,000 census blocks, but over 15,000 census blocks had between 2 and 100 fewer structures. In other words, the 2011 structure/location counts used for CAF are now likely incorrect as compared to the 2019 BSLF count in more than 60% of the census blocks in this subset.

This preliminary data already demonstrates the value of the BSLF process and validates concerns expressed by multiple companies over CAF location mis-counts. Targeted USF programs with location-based commitments hold great promise for closing the digital divide, but the Commission cannot assign and enforce deployment commitments based on out-dated estimates and expect carriers to assume all the risk when the counts are dated. In addition, broadband reporting on an underlying BSLF is necessary for policy makers, regulators, and carriers to know with *specificity* how many locations are reported as broadband served or not served and where they are.

The debate over the reform of the FCC Form 477 is not a matter of shapefiles versus the BSLF. NCTA has consistently mischaracterized the issue. The Broadband Mapping Coalition has always advocated for including the ability of providers to submit service information via shapefile. We agree with NCTA that shapefiles are one of several reasonable methods for broadband providers to report their service data. The difference is that NCTA wants the FCC to stop at shapefiles and not create the BSLF,² but shapefiles alone do not produce the detailed data the Commission needs to responsibly close the digital divide.

We strongly believe that the BSLF and the reporting methodologies should be adopted at the same time, however, if the Commission chooses to begin by requiring shapefile reporting we make three recommendations. First, establish a clear definition of what is meant by “able to serve;” we suggest using the already familiar CAF requirement: must be able to install service within 10 business days of the customer request. Second, allow carriers the flexibility to create service area shapefiles based on either facilities, addresses, or another valid internal method. Mandating a single method that requires some carriers to modify systems will extend the implementation timeline by a year or more. And finally, do not disburse any new funding based

¹ The total number of census blocks the data subset used in this analysis is approximately 120,000. At this stage of the analysis, each location in the BSLF is the structure associated with the primary serviceable structure without identification of multiple units which will likely increase CAF location counts somewhat.

² If NCTA members were significant participants in CAF programs they would likely see the value in having the accurate location counts and geocodes the BSLF will provide because their funding would depend on it.

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on the results of shapefile reporting alone.³ As the early BSLF pilot results indicate, it will be impossible to accurately determine how to target funding until the BSLF is in place.

Please contact the undersigned should you have any questions.

Respectfully submitted,

USTELECOM



By: _____
B. Lynn Follansbee
Vice President –Policy & Advocacy

cc: Nick Degani
Preston Wise
Arielle Roth
Jamie Susskind
Travis Litman
Randy Clarke
Kris Montieth
Steve Rosenberg
Kirk Burgee
Ken Lynch
Giulia McHenry

³ With the possible exception of the totally unserved CBG proposal that USTelecom presented to the Commission on June 24, 2019. It would be possible for the Commission to target funding to these particular CBGs, however, it would still need to address the location/structure count issue.

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Industry Attendees

Mike Saperstein, USTelecom

Mary Henze, AT&T

Ola Oyefusi, AT&T

Mike Lieberman,* AT&T

Jim Hendricks,* Chariton Valley

Barb Galardo,* Consolidated

Mike Skrivan,* Consolidated

Jeff Lanning,* CenturyLink

Richard Rousselot,* CenturyLink

Diana Eisner, Frontier

Mike Jacobs,* ITTA

Genny Morelli,* ITTA

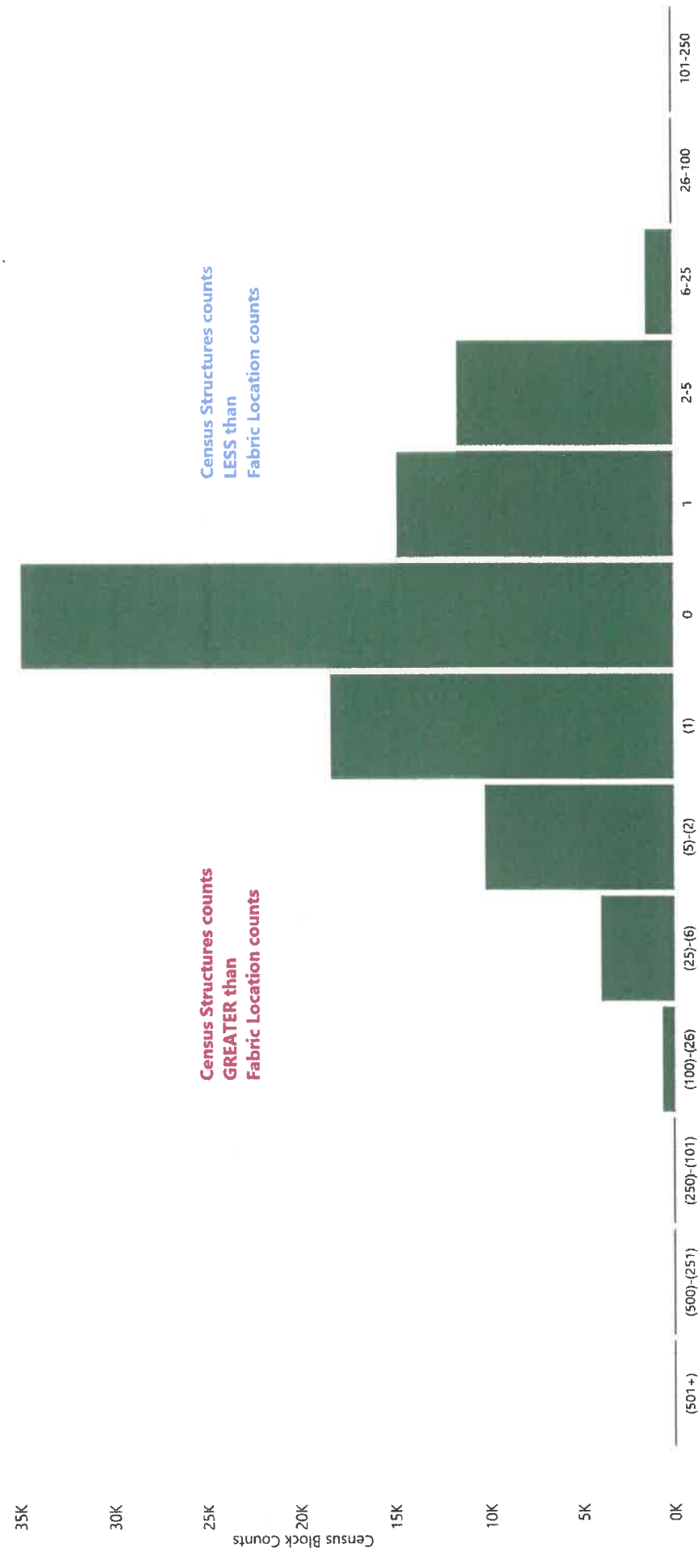
Ian Dillner, Verizon

Thomas Whitehead,* Windstream

Steve Coran,* WISPA

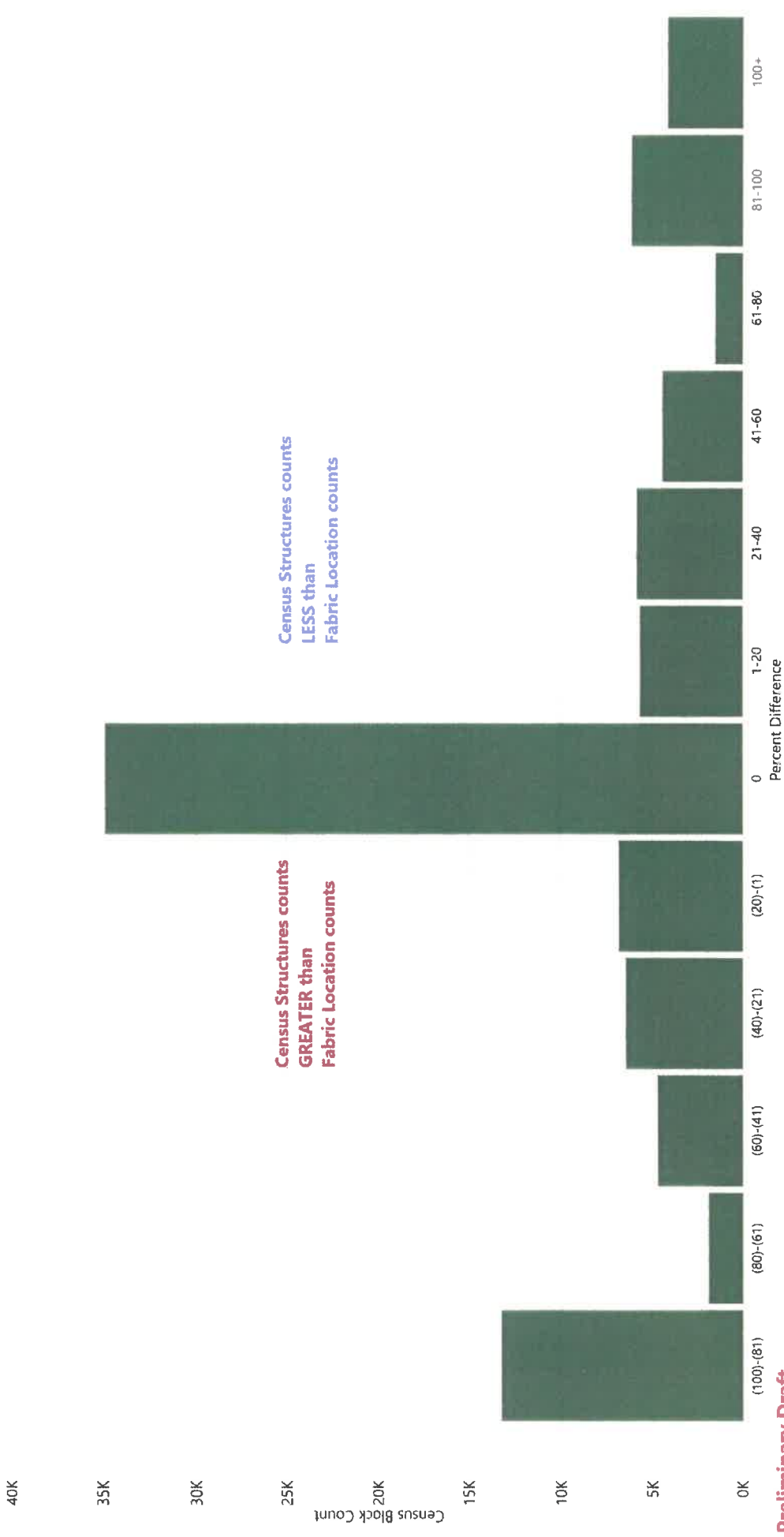
*= On the phone

MO Count Difference for 2011 residential only Census Blocks (CB), comparison by CB of 2011 Census Estimated Housing Unit Structure counts -vs- 2019 Broadband Serviceable Location counts ...



Preliminary Draft
 Census 2011 count based on estimated Residential Structures. Broadband Serviceable Location counts based on Structure.

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