

**Before the  
NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION  
U.S. DEPARTMENT OF COMMERCE  
Washington, DC 20230**

<b>In the Matter of</b>	)	
	)	
<b>Improving the Quality and Accuracy of Broadband Availability Data</b>	)	<b>Docket No. 180427421-8421-01</b>
	)	
	)	

**COMMENTS OF  
ITTA – THE VOICE OF AMERICA’S BROADBAND PROVIDERS**

ITTA – The Voice of America’s Broadband Providers (ITTA) hereby submits its comments in response to NTIA’s *RFC* on actions that can be taken to improve the quality and accuracy of broadband availability data, particularly in rural areas.<sup>1</sup>

**I. DISCUSSION**

The members of ITTA provide a broad range of high-quality broadband, wireline and wireless voice, video, and other communications services on a wholesale and retail basis to residential and business customers in predominantly rural areas across almost all 50 states. ITTA’s members are literally in the trenches effectuating broadband deployment in rural America. ITTA vigilantly pursues federal government policies that promote and support broadband deployment to currently unserved and underserved areas in accordance with Congress’ directive to encourage the deployment of broadband *to all Americans*.<sup>2</sup> ITTA welcomes the opportunity to comment on the *RFC* and looks forward to working with NTIA on

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<sup>1</sup> National Telecommunications and Information Administration, Improving the Quality and Accuracy of Broadband Availability Data, 83 Fed. Reg. 24747 (May 30, 2018) (*RFC*).

<sup>2</sup> See 47 U.S.C. § 1302 (codifying, within Title 47 of the United States Code, Section 706 of the Telecommunications Act of 1996 (1996 Act)); see also American Recovery and Reinvestment Act of 2009, Pub.L. No. 111-5, § (6001)(k)(2)(D), 123 Stat. 115, 516 (2009) (national broadband plan to ensure that “all people of the United States” have access to broadband capability).

an ongoing basis to help identify ways to improve the quality and accuracy of rural broadband availability data.

Noting that the only current source of nationwide broadband availability data is the FCC Form 477, the *RFC* seeks “to augment data from the FCC, other federal government agencies, state government, and the private sector” in order to update the national broadband availability map pursuant to Congress’ directive in the Consolidated Appropriations Act of 2018.<sup>3</sup> NTIA has issued the *RFC* “to solicit informed recommendations and feedback on sources of broadband availability data . . . to inform broadband planning at the state and national levels by promoting the most efficient use of state or federal funding to areas that are insufficiently served by broadband.”<sup>4</sup> The *RFC* poses a series of questions designed to identify additional, existing broadband availability data as well as the specific characteristics, such as geographic scope, of identified data sources.<sup>5</sup>

Among the existing data sources that NTIA may seek to utilize is the High Cost Universal Service Broadband (HUBB) Portal administered by the Universal Service Administrative Company (USAC). Section 54.316 of the FCC’s rules requires rate-of-return carrier recipients of federal universal service support for broadband deployment, price cap carrier recipients of model-based support under the FCC’s Connect America Phase II program, and winners of Connect America Phase II support through competitive bidding to submit geocoded deployment data via the HUBB Portal, and to update HUBB Portal information annually with new deployments.<sup>6</sup> Some of these support recipients additionally are required to file with the HUBB Portal geocoded deployment data for locations served prior to receiving the subject

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<sup>3</sup> *RFC*, 83 Fed. Reg. at 24748.

<sup>4</sup> *Id.* at 24749.

<sup>5</sup> *See id.*

<sup>6</sup> 47 CFR § 54.316.

support.<sup>7</sup> The HUBB Portal provides “real-time validation of geolocated broadband deployment data by conducting a series of automated checks of the information.”<sup>8</sup>

However, HUBB Portal data does not include unsubsidized deployment or the substantial amount of deployment supported by universal service high-cost program funding that is not currently required to be retroactively geocoded and submitted to the HUBB Portal. Thus, HUBB Portal data is of limited utility. Other data sources such as state-specific broadband maps suffer from a too-narrow geographic scope. Additionally, they have not been implemented in every state, and/or lack of updating.

Furthermore, in large measure, data sources that identify where deployment has occurred are not significantly helpful to NTIA’s goals in this inquiry, which it launched with the “intention of identifying gaps in broadband availability that can be used to improve policymaking and inform public investments.”<sup>9</sup> As the *RFC* describes, broadband availability may vary within a single Census block identified as served, “particularly if it is geographically larger (which is most common in rural areas)” than the 95 percent of Census blocks which do not exceed 1 square mile in land area.<sup>10</sup> The FCC also recognizes that knowing where deployment has occurred provides information on the general geographic areas that lack service, but not the

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<sup>7</sup> See, e.g., *Connect America Fund*, Order, 32 FCC Rcd 1445, 1449, para. 14 (WCB 2017) (clarifying the obligations of rate-of-return carrier model-based support recipients to report “pre-existing” broadband deployment information in the HUBB Portal).

<sup>8</sup> USAC, *HUBB Frequently Asked Questions*, <https://www.usac.org/res/documents/hc/pdf/tools/HC-HUBB-FAQ.pdf> (last visited July 16, 2018). The HUBB FAQs further describe the validation measures that the data submitted to the HUBB Portal undergo. See *id.*

<sup>9</sup> *RFC*, 83 Fed. Reg. at 24748. See also *id.* (Congress’ objective in directing NTIA to update the national broadband availability map “is to identify regions of the country with insufficient broadband capacity, particularly in rural areas”).

<sup>10</sup> *Id.*

actual homes or businesses that lack service.<sup>11</sup> Broadband providers and policymakers alike need a comprehensive and accurate accounting of where unserved locations actually, not theoretically, exist. At this juncture, with over 90 percent of Americans enjoying broadband availability, in order to realize Congress' national broadband goal of "all people of the United States" having access to broadband capability, the policy emphasis underlying any mapping effort must be to identify with precision those locations that remain unserved or underserved.

While, as discussed above, the *RFC* poses a series of questions designed to identify additional broadband availability data as well as the specific characteristics of identified data sources, it also invites comment "on the full range of issues" presented by this inquiry.<sup>12</sup> It further specifically seeks comment on whether there are "new approaches, tools, technologies, or methodologies that could be used to capture broadband availability data, particularly in rural areas," what data improvements the government can implement to better identify areas with insufficient broadband capacity, and what other inputs NTIA should seek to inform data-driven broadband policy- and decision-making.<sup>13</sup> ITTA urges NTIA to partner with its sister agency within the Department of Commerce, the Census Bureau, to collect broadband availability data, including geolocation data, via the upcoming 2020 Census. This would be the most effective and efficient way to aggregate broadband availability data with the precision warranted to be a difference-maker in broadband policymaking.

There are numerous reasons why utilizing the 2020 Census is the best approach to achieve NTIA's aims in this inquiry. The substance and mission of the 2020 Census makes it conducive to gather the data that NTIA seeks. The avowed goal of the 2020 Census is to count

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<sup>11</sup> See *Modernizing the FCC Form 477 Data Program*, Further Notice of Proposed Rulemaking, 32 FCC Rcd 6329, 6341, para. 38 (2017).

<sup>12</sup> See *RFC*, 83 Fed. Reg. at 24749.

<sup>13</sup> *Id.*

everyone once “and in the right place.”<sup>14</sup> Among the ways the Census Bureau will achieve this goal is through “continu[ing] to improve its use of . . . geospatial innovations.”<sup>15</sup>

As the Census Bureau describes, the first step will be “to identify all of the addresses where people could live,” in the process “conduct[ing] a 100-percent review and update of the nation’s address list.”<sup>16</sup> This review and update, in turn, is based on data from multiple sources, including the U.S. Postal Service; Tribal, state, and local governments; satellite imagery; third-party data providers; and in-field address canvassing where necessary, beginning in 2019.<sup>17</sup> The 2020 Census will collect data “from all households.”<sup>18</sup>

Logistically, being fellow agencies within the Department of Commerce should facilitate the synergizing of efforts between the two agencies, substantially diminishing the administrative machinations and protracted coordination efforts that often must occur when coordinating between unrelated federal agencies or federal and private entities. And, as the *RFC* notes, there already are proven longstanding partnerships between NTIA and the Census Bureau to gather data on Americans’ broadband adoption and internet use.<sup>19</sup> Whether adding a question to the 2020 Census regarding broadband availability, or even just amassing a comprehensive and

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<sup>14</sup> U.S. Census Bureau, *2020 Census*, <https://www.census.gov/2020census> (last visited July 13, 2018).

<sup>15</sup> *Id.*

<sup>16</sup> U.S. Census Bureau, *2020 Census Operational Plan, Executive Summary, Version 2.0* at 5 (Feb. 2018), <https://www2.census.gov/programs-surveys/decennial/2020/program-management/planning-docs/2020-oper-plan-exec-summ-2.pdf>.

<sup>17</sup> *Id.* at 5-6.

<sup>18</sup> *Id.* at 5.

<sup>19</sup> *See RFC*, 83 Fed. Reg. at 24748-49 (Census Bureau’s American Community Survey includes three household broadband adoption questions, and since 1994, NTIA has partnered with the Census Bureau to survey tens of thousands of U.S. households on their internet and computer use, including the locations, technologies, and devices that people use to go online).

accurate roster of geocoded addresses that can be cross-referenced with network coverage maps, leveraging the 2020 Census should yield for NTIA the most bang for relatively few bucks.

Finally, it is highly likely that the contours of numerous Census blocks will change in light of results of the 2020 Census. Receiving broadband availability data from the Census Bureau, which can also reference the most recent Census block iterations emerging from the 2020 Census, should, as an additional benefit, both facilitate harmonization with and help to update FCC Form 477 data.<sup>20</sup>

## II. CONCLUSION

NTIA's broadband mapping effort must be geared towards identifying with precision those locations that remain unserved or underserved by broadband. For the foregoing reasons, ITTA urges NTIA to partner with its sister agency, the Census Bureau, to leverage the 2020 Census to gather geolocated broadband availability data with the precision warranted to foster informed broadband policymaking.

Respectfully submitted,

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<sup>20</sup> Form 477 data are submitted by voice and broadband providers at the Census block level. *See, e.g., id.* at 24748.