

The vast majority of ACA's members provide fixed wireline service in rural areas and smaller communities and believe that consumers in all locations should have access to broadband service. They also believe that providers offering broadband service above the minimum performance threshold established by the Federal Communications Commission ("FCC"), including those providers currently accessing government support, should not be overbuilt by providers that use government support. For these reasons, ACA members support the government's efforts to have a more precise and accurate broadband map.

ACA members help build the broadband map by providing the government with information about where they make their service available. ACA members fill out FCC Form 477 biennially, providing broadband deployment data on a census block basis. Moreover, some of them also have produced more granular data as part of the one-time Connect America Fund Phase II challenge process, which, despite focusing on limited areas, was a resource-intensive, albeit critical, undertaking both for providers and the FCC.⁵

While the Notice focuses to a large extent on the issue of how to collect accurate and granular deployment data from wireline providers,⁶ the much more fundamental problem with the current broadband mapping effort is that the government lacks the precise location of all households in the US. ACA knows of no existing database that has a complete listing of all US households by address or by latitude and longitude of the premises. This fact was highlighted in testimony given last year by Carol Matthey to the House Subcommittee on Communications and Technology:

While there may be a desire to map broadband coverage in a more granular way at a sub-census block level, there are many practical difficulties in doing so. I am not aware of any comprehensive current dataset showing the geocoded location

⁵ *Connect Am. Fund*, Report and Order, 28 FCC Rcd 7211 (WCB 2013).

⁶ Notice at 24748.

of every structure where one might want broadband to be available in the United States.⁷

In fact, the government acknowledges that it lacks this type of information,⁸ and the less granular information that is available is prone to error.⁹

Without complete information about the locations of US households, there is no way to determine all locations that are unserved, even though ACA members and other wireline broadband providers provide data about where they make service available. And without knowing the households where broadband is not available, there is no way to develop effective policies to reach those housing units. In sum, the government cannot produce a complete and accurate broadband map without first having the complete data set of housing unit locations. After that is accomplished, the government can then move on to examining the data required from broadband providers about their deployments.

Given this situation, as the most important first step to building an effective broadband map, NTIA and other federal and state agencies must determine the precise location of all households in the US. Based on discussions with its service provider members and broadband construction companies, ACA believes that NTIA may be able to address this concern by working with county and other local government agencies to obtain data that identifies all the parcels (discrete land holdings) in the area, some of which have residences or buildings and others of which are empty. This information then could be meshed with US Postal Service address data to derive a relatively complete list of locations by address. This information should

⁷ Testimony of Carol Matthey, Principal, Matthey Consulting LLC, House of Representatives Subcommittee on Communications and Technology, at 5 (June 21, 2017).

⁸ See, e.g., *Modernizing the FCC Form 477 Data Program*, WC Docket No. 11-10, Further Notice of Proposed Rulemaking, 32 FCC Rcd 6329, 6342, para. 39 (2017) (“We also seek comment on whether there is a publicly available, nationwide data set containing the address and location...for each housing unit in the country.”).

⁹ See *Connect Am. Fund Phase II Auction Scheduled for July 24, 2018, Notice and Filing Requirements and Other Procedures for Auction 903*, AU Docket No. 17-182, WC Docket No. 10-90, Public Notice, 33 FCC Rcd 1428, 1436, para. 16 (2018) (recognizing that currently available information may be inaccurate).

then be published by the NTIA for use by others. Of course, these data sets will change regularly, and NTIA will need to re-examine them annually to ensure they are up to date. Furthermore, NTIA might want to give the public the opportunity to weigh in on the information it publishes so that the data can be further improved. After this information is collected, the government can then turn to the task of working with ACA members and others to identify locations where they are making service available.

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