

UNITED STATES DEPARTMENT OF COMMERCE
National Telecommunications and Information Administration
Improving the Quality and Accuracy of Broadband Availability Data
Request for Comments
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Comments from:

**Livingston County Planning Department
Livingston County, New York**

1. Identifying additional broadband availability data:

a. What additional data on broadband availability are available from federal, state, not-for-profit, academic, or private-sector sources to augment the FCC Form 477 data set?

- Broadband service providers maintain records on addresses served. This information should be readily available to local, state and federal government agencies for public planning purposes and to help ensure that adequate, appropriate and affordable service is available to all citizens.
- Various local governments and regional planning entities maintain a variety of Geographic Information System (GIS) datasets for purposes related to community development and developing community asset inventories. Our GIS data is limited to an inventory of broadband assets that could help support the broadband industry (for example, major land uses/ industries which could serve as potential anchor locations, vertical assets, etc.)
- Information such as utility pole permits from utility providers may provide some insight as to what equipment and/or transmission capabilities are currently installed and located.

b. What obstacles—such as concerns about the quality, scope, or format of the data, as well as contractual, confidentiality, or data privacy concerns—might prevent the collaborative use of such data?

- Service providers view data as proprietary and require Non-Disclosure Agreements (NDA) be signed in order to receive actual service locations and/or address information. This hampers the ability to properly assess and plan for broadband needs in communities. Privacy concerns could be easily alleviated by putting protocols in place as to who has access to what type of data and the level of detail provided in those data sets. The NDA is a typical requirement in municipal franchise agreements, making local government officials often feel like they can't be transparent to their constituency.
- Each local government develops their own GIS inventory of broadband assets. These GIS datasets are not standardized. Plus the scope and quality of data and metadata varies local government to local government.

3. New approaches: Are there new approaches, tools, technologies, or methodologies that could be used to capture broadband availability data, particularly in rural areas?

The use of GIS, LIDAR mapping in conjunction with aerial imagery would greatly improve not only the surveying of broadband availability but of other components such as existing utility resources and infrastructure for evaluation of future expansion and/or improvement.

4. Validating broadband availability data:

a. What methodologies, policies, standards, or technologies can be implemented to validate and compare various broadband availability data sources and identify and address conflicts between them?

- A centralized method of compiling and filtering of the various data sets into a single, multilayered file that has filtering capability would be extremely helpful in data analysis, pinpointing potential issues in achieving access as well as the development of a program scope.

b. Do examples or studies of such validation exist?

- Livingston County contracted with a consultant to perform a broadband study in 2010.

c. What thresholds or benchmarks should be taken into account when validating broadband availability, such as bandwidth, latency, geographic coverage, technology type, etc.? How can conformance to such standards be used to evaluate the accuracy of broadband data sets? How could those standards be used to improve policymaking, program management, or research in broadband-related fields?

- Establishing benchmarks such as those mentioned (bandwidth, latency, geographic coverage, technology type) would be helpful in estimating the effectiveness of any proposed implementation strategy. Benchmarking should be a continuous activity and result in reports that can be used to help inform policy making, program management and research in broadband-related fields.

5. Identifying gaps in broadband availability:

a. What data improvements can the government implement to better identify areas with insufficient broadband capacity?

- Develop and implement policies and programs that allow for the collection of requested data from broadband service providers, utility providers and other similar entities that have primary and secondary interaction with broadband access and infrastructure without having to surrender proprietary information. Revise or eliminate non-disclosure agreements with local governments to better allow government officials to share service provider information with constituents.
- Developing a more direct means of receiving end-user data and incorporating the same into the collective data sets would be valuable.

b. What other inputs should NTIA seek to inform data-driven broadband policy- and decision-making?

- Input from the U.S. Department of Homeland Security and NYS Division of Homeland Security on connections with public safety communications systems would be helpful.
- Data from data service providers, such as cellular networks, that provide a similar service that, while not necessarily tied to a specific location, can allow for a more complete picture of the broadband availability options in certain areas. End users of such technology – health care providers, law enforcement, and school districts would also be a good source of input regarding needs assessment and policy.