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July 16, 2018

David J. Redl  
Assistant Secretary for Communications and Information  
National Telecommunications and Information Administration  
U.S. Department of Commerce  
1401 Constitution Avenue, N.W.  
Washington, D.C. 20230

Dear Assistant Secretary Redl:

As Executive Director of the Western Governors' Association (WGA), I am pleased to have the opportunity to provide comments on the importance of improving the quality and accuracy of broadband availability data, particularly in rural areas. High-quality data is necessary to ensure that public broadband deployment efforts are cost effective and prioritize areas that either wholly or significantly lack access.

WGA is an independent organization representing the Governors of 19 western states and three U.S. territories in the Pacific. The Association is an instrument of the Governors for bipartisan policy development, information-sharing and collective action on issues of critical importance to the western United States.

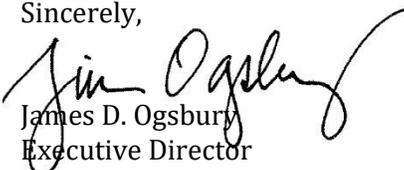
Western states contain many rural areas that lack sufficient access to broadband, as evidenced by the Connect America Funding Phase II [eligible areas](#) and the Federal Communication Commission's (FCC) recently updated [broadband map](#). This widespread lack of connectivity limits communities' access to health care and public safety resources; prevents businesses from competing in the digital economy and diminishes students' access to education and training opportunities. WGA Policy Resolution [2018-13](#), *Workforce Development in the Western United States*, expresses the support of western Governors for congressional and federal efforts to deploy broadband to rural communities to promote workforce development efforts.

Federal efforts, such as the Rural Utilities Service's new broadband pilot program, are critical to closing the digital divide. WGA is concerned, however, that the FCC's updated broadband map is not sufficiently accurate nor granular enough to support efficient and effective broadband deployment in the West.

Through the Form 477 reporting process, the FCC considers a census block "served" if a single residence in the block has access to broadband. This reporting protocol overstates broadband availability in larger, rural census blocks common in western states. WGA is also concerned that the use of "maximum advertised," not "actual," speeds when mapping broadband coverage does not accurately portray the service that customers receive.

On behalf of Western Governors, I encourage you to pursue meaningful partnerships with states to help address these concerns. Please let WGA know how we may meaningfully contribute to your efforts to improve the quality of broadband data and ensure the efficient and effective use of federal funds to promote broadband deployment.

Sincerely,



James D. Ogsbury  
Executive Director