Before the
National Telecommunications and Information Administration
Washington, D.C. 20230

In the Matter of	**)**	
	)	
Improving the Quality and Accuracy of Broadband Availability Data	**)**	**Docket No. 180427421-8421-01**

Comments of the Public Service Commission of Wisconsin

The Public Service Commission of Wisconsin (PSCW) respectfully submits these comments in response to the Request for Comments, dated May 23, 2018, in the above captioned matter.[1]

The PSCW views the Broadband Availability Data as a tool to assist its work in deploying broadband service in rural and underserved areas of the state. Like any other tool, the Broadband Availability Data has both strengths and weaknesses. By acknowledging and adjusting for the known limitations in the data, this agency finds that the Broadband Availability Data can be usefully employed to identify areas that are underserved for purposes of state broadband programs and applications. The comments below describe several uses to which the data is applied, and offer a few recommendations to improve the accuracy of the data.

1. Uses of the Broadband Data

First, the PSCW uses the Broadband Availability Data to create and update a Broadband Coverage Map for Wisconsin, as well as other related mapping products. The broadband map is available on-line. See https://maps.psc.wi.gov/apps/WisconsinBroadbandMap/. A variety of

[1] Improving the Quality and Accuracy of Broadband Availability Data, 83 Fed. Reg. 24,747 (2018) (Request for Comments).

providers, local governments, and consumers can access the map to obtain information about broadband coverage in selected areas of the state.

Second, the PSCW has for several years awarded grants from its Broadband Expansion Grant program to assist the construction of broadband communications facilities to reach underserved areas of the state. The PSCW uses the Broadband Availability Data to determine eligibility for a grant and to evaluate the grant applications.

Third, the PSCW recently used the Broadband Availability Data to determine eligibility for a subsidized rate for broadband service connection through the agency's Focus on Energy program.

Fourth, the PSCW distributes mapping products to legislative staffs and other state agencies upon request. The Wisconsin Department of Administration (DOA) and Department of Public Instruction use the Broadband Availability Data to assess eligibility for state programs that extend broadband access to schools and libraries. The state also used Broadband Availability Data to assist its planning for First Net.

2. Adjustments to the current broadband data

The data collection process intentionally incorporates some inaccuracy into the Broadband Availability Data. The Request for Comments states this issue quite well:

> A provider offering service to any homes or businesses in a Census block is instructed to report that block as served in its Form 477 filing, even though it may not offer broadband services in most of the block. This can lead to overstatements in the level of broadband availability, especially in rural areas where Census blocks are large.

Request for Comments, p. 24,748.

A related issue is that the available speed of a provider's service can vary within a Census block. A provider often submits the highest speed it can provide in the block. In the case of DSL broadband service, the actual speed available is distance-sensitive and can fall off

significantly within a large Census block in a rural area. A broadband service offered by a cable television provider may end abruptly at a municipal boundary that happens to bisect a Census block.

This inaccuracy creates an impression on the part of some consumers that one reason that a location has poor broadband service is that the state Broadband Coverage Map is inaccurate and has misidentified an area as served. Since the PSCW wants to continue to use its Broadband Coverage Map, PSCW staff invests a portion of its time discussing the inaccuracies with providers, consumers, legislative staffs, and other individuals using the data and map products.

The issue of inaccuracies in the Broadband Availability Data is apparent as well with the state's Broadband Expansion Grant program. The program is limited to areas that are underserved under the state program definition. The program instructions emphasize that the Broadband Availability Data and Coverage Map is a starting point for the eligibility analysis, not a final determinant. For grant applications proposing to serve areas that are identified as underserved on the map, the PSCW will accept the map as sufficient evidence that the area is grant eligible. For applications proposing to serve areas that are identified as already served, applicants are permitted to provide statements from customers or actual speed tests to show that the map misstates the quality of broadband service available in the project area.

Competing broadband service providers will sometimes respond to other grant applications with overstated claims of service availability. The investigation of these claims is frustrated at times by the imprecision of the Broadband Availability Data. In some instances, the only way to resolve overlapping and conflicting claims of service availability is to contact potential customers in the area and solicit their view regarding the available internet service.

However, even with these limitations, the Broadband Availability Data does provide a useful starting point for analysis, and also provides an accurate picture of the most underserved areas in the state. With better data, the PSCW could provide a clearer picture of the areas of service deficiency within the state, and could better advise others regarding the cost and priority of areas needing attention.

3. Recommendations for Improvement

The PSCW offers the following responses to questions posed in the Request for Comments:

> **Question No. 3:** ***New approaches*****: Are there new approaches, tools, technologies, or methodologies that could be used to capture broadband availability data, particularly in rural areas?**

First, the PSCW is aware that some providers would furnish address-specific coverage data if the Form 477 could accommodate such a filing. Providers should be permitted to submit address-level detail on an optional basis. The provider could avoid disclosing customer-specific information by indicating an address range in which a broadband service is available.

At least on a voluntary basis, the data could identify the gradations of service quality that exist within a Census block.

Second, it would be useful to capture additional information describing the available broadband service. Currently, the data set uses transmission speed as a proxy for service quality. The data set could be expanded to include other descriptors, such as latency and data caps. A latency measure could indicate whether a broadband service provider could support interactive internet applications with its service. A report of data limits could similarly signal whether a broadband service provider could support a video streaming application as a practical matter.

Third, it would also be beneficial to receive regular and frequent updates to the Broadband Availability Data. The current lag between the collection date and the release date impairs the utility of the data in many instances.

<u>Question No. 5</u>*: Identifying gaps in broadband availability*: What data improvements can the government implement to better identify areas with insufficient broadband capacity?

The Broadband Availability Data could be improved by introducing a sensitivity measure to the coverage data. In other words, the data could indicate the percentage of the Census block that is actually served. If a precise percentage of coverage would be too expensive to measure, or would implicate customer privacy concerns, a more general measure (i.e. less than 25%, less than 50%, more than 50%, more than 75%) would be useful. As it is now, there are neighborhoods throughout this state that are incorrectly reported as served simply because of proximity to an urban area.

The data could also be improved by reporting the transmission speed for mobile wireless services. It may be possible to report other descriptors as well, such as technology available (3G, 4G, etc.) or data caps. An improved data set for mobile wireless services could indicate whether a given mobile wireless service offers a meaningful competitive alternative to other broadband services in an area.

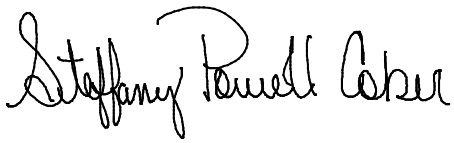
Conclusion

The Public Service Commission of Wisconsin appreciates the opportunity to comment upon improvements to the quality of Broadband Availability Data. The PSCW recognizes that it can be difficult to balance the interests of customers, legislative staffs and state administrative agencies in an accurate and readily accessible picture of the status of broadband deployment with the providers' interest in protecting commercially valuable market share data from public

scrutiny. However, this data is an important element of this agency's effort to improve broadband service in the state, and every effort should be made to provide state decision makers with the information needed to make informed decisions regarding funding and deployment of broadband service.

Dated at Madison, Wisconsin, the 12th day of July, 2018.

By the Commission:



Steffany Powell Coker
Secretary to the Commission

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