Before the
DEPARTMENT OF COMMERCE
National Telecommunications and Information Administration
Washington, D.C.

Notice and Request for Comment	)
	)
Improving the Quality and Accuracy of	)
Broadband Availability Data	)

COMMENTS OF THE NATIONAL ASSOCIATION OF TOWNS AND TOWNSHIPS (NATaT)

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I. Introduction and Summary

The members of the National Association of Towns and Townships (NATaT) are pleased to provide feedback on the Department of Commerce's and National Telecommunications and Information Administration's ("NTIA's") Notice and Request for Public Comment ("Request") on Improving the Quality and Accuracy of Broadband Availability Data. NATaT was formed more than 40 years ago to represent its members in Washington, D.C. -- an association of more than 10,000 municipalities comprising mostly smaller communities, towns and townships, and other suburban and rural localities. About 85 percent of NATaT's members serve communities with less than 10,000 people and nearly half have fewer than 1,000 residents.

Expanded access to high-speed Internet is the key to improving economic growth and other opportunities in rural America. Better broadband access can help rural farmers lower their production costs through precision agriculture applications while increasing the size of the market for the sale of their goods. It can enhance opportunities in education, healthcare, and government services. Telehealth services can remotely connect rural patients to urban medical specialists resulting in better care and outcomes or provide rural classrooms with access to new learning experiences. High-speed Internet can also improve the delivery of government services and increase citizen engagement. But for a large swath of rural Americans, these opportunities do not exist due to the lack of high-speed Internet. According to the Federal Communications Commission's (FCC) latest Broadband Deployment Report, 32.4 percent of rural Americans have no access to Either 25 Mbps/3 Mbps fixed terrestrial services or mobile LTE at speeds of 5 Mbps/1 Mbps, whereas 97.9% of urban Americans enjoy service.[1] An additional 34 million rural Americans lack access to either of these services.

For policymakers, a key factor in bridging this digital divide is the collection and analysis of better data. We need more accurate, granular data on service availability to ensure that government efforts to support broadband deployment in unserved areas of rural America target resources as efficiently as possible. There are numerous federal grant and subsidy programs as well as various state programs that rely upon accurate broadband data. This information can help policymakers determine whether regulatory changes or new rules are needed to spur deployment.

[1] *See* https://www.fcc.gov/reports-research/reports/broadband-progress-reports/2018-broadband-deployment-report

II. Data Granularity

NATaT appreciates NTIA's recognition that current data collection processes do not provide an accurate representation of broadband availability, especially in rural areas where census blocks are large. NATaT recommends that NTIA in coordination with other federal and state government agencies should pursue an increase in granularity of fixed broadband deployment data. Census blocks are the basis for all geographic boundaries for which the Census Bureau tabulates data. These statistical areas are bounded by visible features such as roads, streams, and railroad tracks, and by nonvisible boundaries such as property lines, city, township, school district, county limits, and short line-of-sight extensions of roads.[2] Beginning in 2014, the underlying data collected by the FCC counted all providers of broadband service to fixed residential locations, including fixed wireless and satellite, at the census block-level. Prior to 2014, the FCC used tract-level census data.

We are very concerned about how a census block is considered "served" by the Commission. The FCC considers a census block served when only one residence on the block is served. Rural areas may have large census blocks in which only a few people have access to Internet service. Addressing these shortcomings, the FCC recognized that "stakeholders have recommended collecting and reporting deployment data at various sub-census block geographies, including at the street level or parcel level." [3]

We agree that more granular data at either the address or street segment level would be helpful in estimating how much of the population in a rural census block actually has access. Most state and local governments have information on their road networks publicly available, and providers can use that as a starting point. Internet Service Providers (ISPs) argue that "more granular data at this level would be burdensome to collect and unlikely to provide meaningful improvement in the Commission's decisions relative to the granular census block level data the Commission already collects."[4] However, these commenters do acknowledge that there may be value in collecting more granular data in sparsely populated areas, where the availability of broadband at one street address is less likely to mean that every street address in the block is covered.

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[2] *See* https://www.census.gov/newsroom/blogs/random-samplings/2011/07/what-are-census-blocks.html
[3] *Modernizing the FCC Form 477 Data Program*, Further Notice of Proposed Rulemaking, at 38.
[4] *See* https://ecfsapi.fcc.gov/file/1010580905912/101017%2011-10%20Comments.pdf

Focusing first on census blocks that are large enough to make sub-block variation more likely would lessen the burden on ISPs. Additionally, instead of defining a census block as "served" based on one household or other structure, a block could be considered served if 50 percent of the households have broadband service.

III. Data Accuracy

A challenge process is an important factor in determining whether a census block is served or unserved by voice and broadband. It helps ensure that limited federal support is targeted to areas that are truly unserved. To avoid being overbuilt with Connect America Funds, the FCC has provided carriers the opportunity to challenge the National Broadband Map's designation of a census block as unserved by filing Form 477 data. It also provides an opportunity for state and local governments and other organizations to help boost the accuracy of broadband availability maps. To ensure the robustness of the challenge process, these entities must be given sufficient time to collect the data that is necessary to mount successful challenges. As part of the FCC's Mobility Fund Phase II proceedings, the Commission extended the challenge process window by 90 days to a total of 150 days to encourage municipal governments and other entities to participate in the effort. NATaT members welcome the opportunity to help provide supplemental data when possible to policymakers or third-party clearinghouses about broadband availability in their communities. Municipalities could for example provide a list of addresses they believe to be unserved within their jurisdictions.

IV. Additional Sources for Data Collection

The National Broadband Map was designed to put consumers in control of broadband access and information. It was created and maintained by the NTIA, in collaboration with the FCC, and in partnership with 50 states, five U.S. territories, and the District of Columbia. It was first published in February 2011 and updated every six months through April 2015 with data from the State Broadband Initiative (SBI). Data displayed on the National Broadband Map site are as of June 30, 2014 and have not been updated since. In May 2015, NTIA transferred the map to the FCC. The Commission now collects broadband data twice a year from service providers through the Form 477 data collection, beginning with the date as of December 2014.

Although the mandatory, semi-annual Form 477 process is certified by the provider, there is no means of validating the data submitted. Separately, as part of the SBI, states collected and verified fixed and mobile broadband data, but ISP participation was voluntary, resulting in coverage gaps. The FY18 Omnibus bill included $7.5 million for NTIA to "update the national broadband availability map in coordination with" the FCC. A portion of that appropriated funding should be used to assess the efficacy of coordinating data collection efforts from state governments and third-party groups such as Connected Nation and BroadbandNow.com. Twenty-five states have broadband offices with most focused on increasing broadband supply through mapping.[5] Last year, the North Carolina Department of Information Technology's Broadband Infrastructure Office launched the N.C. Broadband Map, a crowdsourced interactive mapping tool that reports broadband availability and speeds. [6] With or without more federal funding to accurately illustrate national broadband coverage, regardless of which agency ultimately administers this program, policymakers can leverage ongoing efforts at the state-level to supplement federal data collection programs.

V. Conclusion

Again, we appreciate the opportunity to provide comments to NTIA on ways to improve data collection to ensure an accurate depiction of the nation's broadband availability. NATaT and its members support the Administration's work to improve the collection, analysis, and dissemination of data relevant to broadband availability.

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[5] *See* http://www.bbcmag.com/2016mags/May_June/BBC_May16_FiftyStates.pdf
[6] *See* https://statescoop.com/crowdsourced-broadband-mapping-helps-north-carolina-clean-its-data