Suspect that comment to spec is undeliverable, intentionally so. (see below) This rural town of ~66 mile^2 has no broadband service as defined, except possibly for rare satellite services vulnerable to weather conditions, expensive, and subject to unfavorable contract terms. Most ISP services in this town are DSL over twisted pair with max rates of ~5 Mbps down, <= 1 Mbps up, Performance deteriorates rapidly with distance from a limited number of DSLAMs, but you know that.

Regards,
Timothy O'Dell
Appointed town rep. to regional planning commission
Corinth, Vermont

Please note: forwarded message attached - response to my 1st Selectman et al

From: "Tim O'Dell" <todell6@juno.com>
To:
Cc:
Subject: Re: Fwd: Broadband comment opportunity
Date: Thu, 14 Jun 2018 13:26:49 GMT
While perhaps not above my pay grade, where would any citizen, select person or town manger go for such data (see below) if not already "in the business" in some way? The request is for existing data sets, or leads to such, that provide detail at the census block level or below. Census blocks are typically ~ one mile^2 to a few mile^2 in rural areas. Telecom providers, if they have such data sets, are likely to regard them as proprietary, and, having paid to collect them, are unlikely to part with them free of charge, I suspect.

This is a job for the 2020 census, IMO. Is this exercise simply to make a case for ennumerators' putting shoe leather into it?

24749
Federal Register
/ Vol. 83, No. 104 / Wednesday, May 30, 2018 / Notices
Request for Comments:
NTIA invites
comment on the full range of issues that
may be presented by this inquiry,
including issues that are not specifically
raised in the questions below.
Commenters are encouraged to address
any or all of the questions below.
Comments that contain references to
studies, research, and other empirical
data that are not widely published
should include copies of the referenced
materials with the submitted comments.
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?
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?
2.
Technology type, service areas, and
bandwidth:
Please consider providing a
table or spreadsheet attachment when
responding to question 2, if needed.
a. For each broadband availability
data source, please define the specific
broadband technologies (
e.g.,
wireline,
cable, fixed wireless, satellite, multiple
sources, etc.) included in the data set.
Please explain the service areas or
geographic scope of the data set
(e.g.,
Census block, county, cable franchises,
publicly funded service areas, etc.) and
describe how records from the data set
could be matched with records from
Form 477 data.
b. Describe how frequently the data
set is updated and the methodology
used for collection and what measures
are employed to validate or otherwise

ensure the data is accurate. Please explain whether the data set differentiates between subscribed bandwidth and maximum available speeds.

c. For each data set, please provide the name(s) and type(s) of entity that collects the data.

d. Finally, please specify the format of the data (e.g.,CSV, specific database, specific Geographic Information System (GIS) format, etc.)

3.

New approaches:

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

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?

b. Do examples or studies of such validation exist?

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?

5.

Identifying gaps in broadband availability:

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

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

Instructions for Commenters:

Comments submitted by email should be machine-readable and should not be copy-protected. Comments submitted by mail may be in hard copy (paper) or electronic (on CD–ROM or disk). Responders should include the name of the person or organization filing the comment, as well as a page number on each page of their submissions. All comments received are a part of the public record and will generally be posted on the NTIA website, https:// www.ntia.doc.gov, without change. All personal identifying information (for example, name, address) voluntarily submitted by the commenter may be publicly accessible. Do not submit confidential business information or otherwise sensitive or protected information. NTIA will accept anonymous comments.