



July 16, 2018

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

Dear Administrator Redl:

Competitive Carriers Association (“CCA”)¹ submits this letter to the National Telecommunications and Information Administration (“NTIA”) in response to its Request for Comment (“RFC”) on the matter of Improving the Quality and Accuracy of Broadband Availability Data. CCA commends NTIA for initiating this proceeding and for its ongoing efforts to improve the way broadband data is measured in the United States. To that end, CCA encourages NTIA to evaluate mobile broadband coverage data as well as fixed wireless and wireline broadband data and submits further recommendations to achieve this mutual goal.

When determining the accuracy and quality of broadband availability data, NTIA (and all other relevant agencies) must include an overview of current mobile broadband services offered throughout the United States, as Americans increasingly rely on wireless networks to connect. It is important to have a complete picture of connectivity, including geographic coverage as well as residential locations. Accurate mobile broadband data is key to rural American communities’ economic development, educational and medical engagement, advancements in precision agriculture, and critical connections to public safety. While North Americans are already consuming over 2.5 exabytes of data wireless connections each month,² unreliable coverage data exacerbates the digital divide, and risks leaving rural Americans behind in a mobile world. CCA supports using reliable, standardized data that reflect consumers’ experiences in their communities to best measure mobile

¹ CCA is the leading association for competitive wireless providers and stakeholders across the United States. CCA’s membership includes nearly 100 competitive wireless providers ranging from small, rural carriers serving fewer than 5,000 subscribers to regional and national providers serving millions of customers. CCA also represents associate members consisting of small businesses, vendors, and suppliers that provide products and services throughout the mobile communications supply chain.

² See: Ericsson Mobility Report, June 2018, available at <https://www.ericsson.com/en/mobility-report/reports/june-2018/mobile-data-traffic-growth-outlook>

broadband coverage.³ Only with reliable mobile coverage data will industry and government have a clear understanding of availability across the United States to craft policy decisions that bridge the digital divide.

Multiple Members of Congress from both chambers have provided bipartisan guidance on the need to ascertain the nation's mobile broadband coverage, and frequently expressed their interest in reliable mobile broadband coverage data that matches their experiences and those of their constituents.⁴ Congress also recently introduced multiple pieces of legislation to address data inaccuracies, including legislation that is now law.⁵ CCA commends this leadership and supports repeated and ongoing efforts from both sides of the aisle in both chambers to improve mobile broadband coverage data, including identifying rural areas lacking services reasonably comparable to urban areas and enacting policies to preserve and expand mobile broadband services.

As its efforts move forward, NITA must consider lessons learned from mobile coverage data collection and use from the Federal Communications Commission's ("FCC") Mobility Fund Phase II ("MF II") program one-time data collection. It is now unfortunately clear that the technological parameters selected by the FCC were not sufficient to produce a map that reflects the coverage experienced on the ground. Future collections must standardize parameters, including Reference Signal Received Power, and clearly define clutter factors.⁶ Additionally, NITA and others should engage 3rd party data providers to learn from their expertise and consider investing in datasets to ensure device-level consumer experiences are understood.

³ See, e.g., Comments of Competitive Carriers Association, WC Docket Nos. 10-90 & 10-208 (filed Apr. 26, 2017) ("CCA MF II Comments"); Reply Comments of Competitive Carriers Association, WC Docket Nos. 10-90 & 10-208 (filed May 11, 2017) ("CCA MF II Reply Comments").

⁴ See, Letter from Sens. Wicker (R-MS), Manchin (D-WV), Baldwin (D-WI), Blunt (R-MO), Burr (R-NC), Capito (R-WV), Daines (R-MT), Ernst (R-IA), Fischer (R-NE), Gardner (R-CO), Heitkamp (D-ND), Johnson (R-WI), King (I-ME), Klobuchar (D-MN), McCaskill (D-MO), Moran (R-KS), Peters (D-MI), Roberts (R-KS), Rubio (R-FL), Tillis (R-NC), Vitter (R-LA), Warner (D-VA), Wyden (D-OR), Cochran (R-MS), Boozman (R-AR), Kirk (R-IL), U.S. Senate, to the Hon. Tom Wheeler, Chairman, Federal Communications Commission (July 11, 2016), available at https://apps.fcc.gov/edocs_public/attachmatch/DOC-341429A2.pdf; Letter from Sens. Wicker (R-MS), Hassan (D-NH), Gardner (R-CO), King (I-ME), Moran (R-KS), Klobuchar (D-MN), Roberts (R-KS), Peters (D-MI), Blunt (R-MO), and Tillis (R-NC) U.S. Senate, to the Hon. Ajit Pai, Chairman, Federal Communications Commission (March 8, 2018), available at <https://www.wicker.senate.gov/public/cache/files/f03ebd53-a4fe-4b5d-b21e-594a3180d0f5/letter-to-fcc-re-mf-ii.pdf>. See Letter from Sens. Wicker (R-MS), Hassan (D-NH), Moran (R-KS), Schatz (D-HI), Blunt (R-MO), King (I-ME), Gardner (R-CO), Brown (D-OH), Roberts (R-KS), Shaheen (D-NH), Lankford (R-OK), Wyden (D-OR), Shelby (R-AL), Baldwin (D-WI), Hyde-Smith (R-MS), Leahy (D-VT), Johnson (R-WI), Klobuchar (D-MN), Young (R-IN), Coons (D-DE), Tillis (R-NC), McCaskill (D-MO), Harris (D-CA), Smith (D-MN), Udall (D-NM), Cortez-Masto (D-NV), Duckworth (D-IL), Jones (D-AL), Markey (D-MA), Fischer (R-NE), U.S. Senate to The Hon. Ajit Pai, Chairman, Federal Communications Commission (May 30, 2018), available at <https://docs.fcc.gov/public/attachments/DOC-351493A2.pdf>.

⁵ See, e.g., S. 2995, the Mobile Accuracy and Precision Broadband (MAP Broadband) Act of 2018; See H.R. 1625, the Consolidated Appropriations Act of 2018; H.R. 1546, the Rural Wireless Access Act; See H.R. 4986, RAY BAUM's Act; S. 1621, The Rural Wireless Access Act; H.R. 4810, the Making Available Plans to Promote Investment in Next Generation Networks without Overlapping and Waste (MAPPING NOW) Act of 2018; H.R. 2903 and S. 2418, The Rural, Reasonable, and Comparable Wireless Act.

⁶ Letter from Rebecca Murphy Thompson, EVP & GC, CCA to Ms. Marlene Dortch, Secretary, Federal Communications Commission, WC Docket No. 10-90 & WT Docket No. 10-208 (filed July 27, 2017), [https://ecfsapi.fcc.gov/file/10728107133235/CCA%20Mobility%20Fund%20II%20July%202017%20Ex%20Parte%20\(072717\).pdf](https://ecfsapi.fcc.gov/file/10728107133235/CCA%20Mobility%20Fund%20II%20July%202017%20Ex%20Parte%20(072717).pdf)

The FCC structured the MF II process to use a “challenge process” to correct areas where coverage of unsubsidized 4G LTE mobile broadband service is overstated.⁷ This process shifts a significant burden to correct mapping flaws to carriers, states, and local governments, without providing resources to conduct tests or any certainty of obtaining support for an area successfully challenged. The unsustainable process adopted by the FCC represents a significant barrier to verifying mobile broadband availability data and applied unrealistic time and resource estimates for the resources needed to conduct challenges. In response to concerns regarding the challenge process, FCC Chairman Ajit Pai has expressed his support for extending the challenge process window by 90 days.⁸ While this extension will help, overstated coverage areas that are not successfully challenged could be deemed effectively served.

CCA commends NTIA on efforts to improve the quality and accuracy of broadband data, and to help bridge the digital divide through input from a variety of stakeholders. CCA and its members look forward to continued engagement with the Administration, Congress, and the FCC, working with policymakers to connect all Americans, regardless of where they live, travel, work, or play to next generation mobile broadband technologies.

Respectfully submitted,

/s/ Steven K. Berry

Steven K. Berry
President & CEO
Competitive Carriers Association

⁷ FCC, Mobility Fund II Initial Eligible Areas Map (rel. May 22, 2018), *available at* <https://www.fcc.gov/maps/mobility-fund-ii-initial-eligible-areas-map/>.

⁸ See Letter from The Hon. Ajit Pai, Chairman, Federal Communications Commission to Sens. Wicker (R-MS), Hassan (D-NH), Moran (R-KS), Schatz (D-HI), Blunt (R-MO), King (I-ME), Gardner (R-CO), Brown (D-OH), Roberts (R-KS), Shaheen (D-NH), Lankford (R-OK), Wyden (D-OR), Shelby (R-AL), Baldwin (D-WI), Hyde-Smith (R-MS), Leahy (D-VT), Johnson (R-WI), Klobuchar (D-MN), Young (R-IN), Coons (D-DE), Tillis (R-NC), McCaskill (D-MO), Harris (D-CA), Smith (D-MN), Udall (D-NM), Cortez-Masto (D-NV), Duckworth (D-IL), Jones (D-AL), Markey (D-MA), Fischer (R-NE), U.S. Senate (May 30, 2018), *available at* <https://docs.fcc.gov/public/attachments/DOC-351493A1.pdf>.