
October 10, 2019

The Honorable Ajit Pai
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Dear Chairman Pai:

The Western Governors' Association (WGA) appreciates the opportunity to provide comments on the Second Further Notice of Proposed Rulemaking for Establishing the Digital Opportunity Data Collection and Modernizing the FCC Form 477 Data Program (Second FNPRM). The collection of accurate and granular fixed broadband coverage data is a necessary step in closing the digital divide.

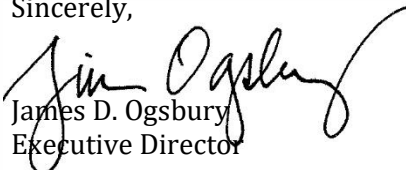
In [previous correspondence](#) regarding broadband data and mapping, WGA describes challenges associated with the Federal Communication Commission's (FCC) Form 477 reporting process. This included the protocol that considered a census block "served" if a single residence in the block had access to broadband. This procedure tended to overstate broadband availability in larger, rural census blocks common in western states. On behalf of Western Governors, I wish to express appreciation to the Commission for addressing this issue in the Second FNPRM. Transitioning to a system based on geospatial data and shapefile reporting will lead to a better approximation of our nation's fixed broadband coverage.

WGA also supports tightening the definition of "available service" used in the Form 477 reporting process. By specifying that a provider "must have fiber or cable in place proximate, if not connected, to the locations within its reported polygons," in order to count an area as "served," it will be easier to create granular maps showing where broadband coverage is and is not located.

The Second FNPRM also considers various questions related to the use of crowdsourced data for improving fixed and mobile broadband coverage approximations. Given that many states have experience with using crowdsourced and third-party broadband data, state broadband offices could offer the FCC valuable insights from their experience. We also encourage the FCC to coordinate with the National Telecommunications and Information Administration regarding its use of state-level data in an ongoing eight-state pilot program.

WGA appreciates the Commission's attention to its concerns regarding the issue of census block-based reporting. We encourage you to utilize the expertise of Governors and state broadband offices as you consider and implement the rules contained in the Second FNPRM.

Sincerely,



James D. Ogsbury
Executive Director

Identical letters sent to Commissioners Carr, O'Rielly, Rosenworcel, and Starks