



# PUBLIC NOTICE

Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

News Media Information 202-418-0500  
Internet: [www.fcc.gov](http://www.fcc.gov)  
TTY: 888-835-5322

DA 22-413

Released: April 14, 2022

## **BROADBAND DATA TASK FORCE ANNOUNCES ACCESS TO PRELIMINARY BROADBAND SERVICEABLE LOCATION FABRIC TO FIXED SERVICE PROVIDERS AND GUIDANCE FOR FILING FIXED BROADBAND AVAILABILITY DATA**

**WC Docket Nos. 19-195, 11-10**

By this Public Notice, the Broadband Data Task Force, Wireline Competition Bureau (WCB), and Office of Economics and Analytics (OEA) announce that fixed broadband service providers may now access a preliminary version of the Broadband Serviceable Location Fabric (Fabric) to assist them in preparing their broadband availability data for the Broadband Data Collection (BDC). This preliminary version of the Fabric will help fixed service providers with developing processes to prepare their availability data submissions. Broadband availability data can be submitted in the BDC beginning on June 30, 2022 and are due no later than September 1, 2022.<sup>1</sup> The Broadband Data Task Force, WCB, and OEA also provide details on the data sources and elements included in the Fabric, as well as guidance to broadband service providers on how to prepare fixed broadband availability data that conform with the Fabric as part of their biannual BDC filings. Specifically, this Public Notice: (1) provides information for providers of fixed broadband service on how to access the preliminary Fabric; (2) identifies the data sources used in, and elements of, the Fabric; (3) confirms that the Fabric will identify broadband serviceable locations using a unique, Commission-issued identifier (Location ID), a set of latitude/longitude coordinates within the boundaries of each structure, and, where feasible, a street address; and (4) specifies that fixed broadband providers that do not use availability polygons must submit their broadband availability data using the unique Location IDs in the Fabric.

### **Background**

In March 2020, Congress passed the Broadband DATA Act (BDA)<sup>2</sup> requiring the Commission to establish (1) a biannual collection of geographically granular broadband coverage data for use in creating coverage maps;<sup>3</sup> (2) a comprehensive database of broadband serviceable locations (i.e., the Fabric);<sup>4</sup> and (3) processes for challenges to the coverage data and the Fabric.<sup>5</sup> The BDA requires that the Commission's rules include uniform standards for the collection of broadband availability data from providers that "can be georeferenced to the GIS [geographic information system] data in the Fabric."<sup>6</sup>

---

<sup>1</sup> See *Broadband Data Task Force and Office of Economics and Analytics Announce Inaugural Broadband Data Collection Filing Dates*, WC Docket Nos. 19-195, 11-10, Public Notice, DA 22-182, at 9 (Broadband Data Task Force, OEA Feb. 22, 2022) (*BDC Filing Window PN*).

<sup>2</sup> Broadband Deployment Accuracy and Technology Availability Act, Pub. L. No. 116-130, 134 Stat. 228 (2020) (codified at 47 U.S.C. §§ 641-646) (Broadband DATA Act).

<sup>3</sup> 47 U.S.C. §§ 642(a)(1)(A), (a)(2).

<sup>4</sup> *Id.* § 642(b)(1).

<sup>5</sup> *Id.* § 642(a)(5).

Pursuant to the BDA, fixed broadband providers can report broadband availability data using either (1) availability polygons<sup>7</sup> or (2) a list of addresses or locations,<sup>8</sup> and in both cases the availability data will be reported on the BDC maps on a location-basis tied to the Fabric such that consumers, and state, local, and Tribal governments and other third parties can view and, if applicable, submit challenges to the data.<sup>9</sup>

Consistent with the BDA, the Commission has adopted rules establishing certain elements of the Fabric.<sup>10</sup> In the *Second Order and Third Further Notice*, the Commission determined “that the Fabric will consist of a single, nationwide [dataset] that will contain geocoded locations for all locations where a broadband connection can be installed,” and sought comment on “what data sources and methods . . . Commission staff [can] use to verify the accuracy of the Fabric[.]”<sup>11</sup> In the *Third Report and Order*, the Commission adopted additional details about the Fabric, including:

- adopting a definition of “location” (for purposes of the Fabric) as “a business or residential location in the United States at which fixed broadband internet access service is, or can be, installed;”<sup>12</sup>
- determining that the Fabric will “reflect each location as a single point defined by a set of geographic coordinates that fall within the footprint of a building;”<sup>13</sup>
- declining “to commit to a specific role for address data until we are able to determine the types of data and functionality that will be available through the [Fabric] procurement process;”<sup>14</sup>
- determining to use definitions of “residential” and “business” locations that are based on the definitions of those terms as used in connection with the Connect America Fund, with certain modifications;<sup>15</sup>

(Continued from previous page) \_\_\_\_\_

<sup>6</sup> *Id.* § 642(b)(2)(A)(iii).

<sup>7</sup> The Broadband DATA Act uses the term “shapefiles,” which is defined in the statute as “a digital storage format containing geospatial or location-based data and attribute information (A) regarding the availability of broadband internet access service; and (B) that can be viewed, edited, and mapped in geographic information system software.” 47 U.S.C. § 641(13). We use the more generic reference to “availability polygons” in this Public Notice to avoid any misunderstanding that filers are limited to submitting these data using a proprietary storage format.

<sup>8</sup> 47 U.S.C. § 642(b)(2)(A)(iv)(I)(bb).

<sup>9</sup> See *Establishing the Digital Opportunity Data Collection; Modernizing the FCC Form 477 Data Program*, WC Docket Nos. 19-195, 11-10, Third Report and Order, 36 FCC Rcd 1126, 1161-62, 1163-64, paras. 89, 95-96 (2021) (*Third Report and Order*). The public BDC maps will reflect the fact that a challenge has been filed for a particular location, but other location-specific data submitted to challenge the availability of a provider’s service at that location will be kept confidential by the Commission and be made available to the provider solely for the purpose of either rebutting the challenge or conceding and removing the challenged location from its data.

<sup>10</sup> *Establishing the Digital Opportunity Data Collection; Modernizing the FCC Form 477 Data Program*, WC Docket Nos. 19-195, 11-10, Second Report and Order and Third Further Notice of Proposed Rulemaking, 35 FCC Rcd 7460 (2020) (*Second Order and Third Further Notice*); *Third Report and Order*, 36 FCC Rcd at 1175-77, paras. 126-32 (2021).

<sup>11</sup> *Second Order and Third Further Notice*, 35 FCC Rcd at 7484, 7523, paras. 54, 173.

<sup>12</sup> *Third Report and Order*, 36 FCC Rcd at 1175, para. 126.

<sup>13</sup> *Id.*

<sup>14</sup> *Id.* at 1175-76, para. 126.

<sup>15</sup> Specifically, a “residential location” in the Fabric is defined as all residential structures, including all structures that are, or contain, housing units or group quarters based on the U.S. Census Bureau definition of these terms. *Third Report and Order*, 36 FCC Rcd at 1176, para. 127. A “business location” in the Fabric is defined as “all non-residential (business, government, non-profit, etc.) structures that are on a property without residential locations and that would be expected to demand broadband Internet access service.” *Id.* at para. 128.

- determining to identify a Multi-Tenant Environment (MTE) as a single location record in the Fabric and, to the extent feasible, to associate the number of units within each MTE with the MTE's location information in the Fabric;<sup>16</sup>
- noting that the procurement process will define what types of data and functionality are available and practical for inclusion in the Fabric;<sup>17</sup> and
- directing OEA, in consultation with WCB, to:
  - determine what additional features or datasets are both available and useful for inclusion in the Fabric;<sup>18</sup>
  - ensure that locations (such as marinas, mobile home parks, and homes without electric power) reflect broadband serviceability to the extent they are able to make determinations given the data available;<sup>19</sup>
  - ensure that the treatment of mixed business/residential locations (e.g., multi-tenant units with commercial space on the ground floor and apartments above) reflect broadband serviceability to the extent they are able to make determinations given the data available;<sup>20</sup> and
  - analyze the possibility of identifying each unit in an MTE during the procurement process.<sup>21</sup>

On June 1, 2021, the Commission released a Request for Proposal (RFP) on the Fabric. Responses to the RFP were submitted on July 1, 2021. In response to a pre-award protest filed by an offeror on July 30, 2021, the Commission delivered a revised RFP to all offerors on August 13, 2021, and revised proposals were due August 26, 2021. On November 9, 2021, the Commission awarded the contract for Fabric development to CostQuest Associates. Subsequently, a potential vendor filed a post-award protest with the Government Accountability Office (GAO), as permitted under the Federal Acquisition Regulations (FAR). As required by the FAR, the Commission suspended performance of the contract while GAO deliberated on the protest. GAO issued a decision in the Commission's favor on February 24, 2022, and Commission staff immediately thereafter began working with CostQuest on development of the Fabric.

Work is continuing on the initial production version of the Fabric that will serve as the foundation for the fixed broadband availability data submitted in the BDC starting on June 30, 2022.<sup>22</sup> While this work is underway, Commission staff and CostQuest have prepared a preliminary version of the Fabric and are making that available to fixed service providers to assist them with developing processes to prepare their availability data submissions. This preliminary version includes many, but not necessarily

---

<sup>16</sup> *Third Report and Order*, 36 FCC Rcd at 1177, para. 130.

<sup>17</sup> *Id.* at 1177, para. 132.

<sup>18</sup> *Id.*

<sup>19</sup> *Id.* at 1176-77, para. 129 (noting that while “[w]e anticipate that the Fabric will include all individual structures to which broadband Internet access service can be installed . . . [t]here may be some circumstances, however, where counting each individual building or structure might not reflect the way broadband service is provisioned (e.g., broadband may not be deployed individually to each occupied boat in a marina or to a central location in the marina; or to homes without electric power).”).

<sup>20</sup> *Id.* at 1177, para. 130.

<sup>21</sup> *Id.*

<sup>22</sup> *BDC Filing Window PN* at 9. We will make the initial production version of the Fabric available to filers as far in advance of the June 30, 2022 opening of the filing window as possible.

all, of the data and features to be included in the production version of the Fabric. Below, we provide information on how fixed broadband service providers may access the preliminary data, which are currently available for the 50 states and the District of Columbia.<sup>23</sup> Given the preliminary nature of this dataset, some of the values for each location have been omitted; these values will be included in later releases of Fabric data.

This preliminary dataset will enable fixed service providers to develop and test their methods to align their broadband availability data with the Fabric data format. CostQuest and Commission staff are continuing to refine the location data in the Fabric to meet the requirements laid out by the Commission, and expect that the production Fabric data will differ from the preliminary data in at least some circumstances due to differences in the methodologies used to create the two datasets. For example, some points presumptively identified by CostQuest as broadband-serviceable locations (BSLs) in the preliminary Fabric data may not be considered BSLs in the initial production dataset; inversely, the production dataset may contain BSLs not previously identified in the preliminary dataset (including additional BSLs at a place previously associated with only one BSL). Other information about BSLs, including the coordinates (latitude and longitude), estimated unit count, and/or address, could also change.

Nevertheless, by familiarizing themselves with the preliminary data now, fixed broadband service providers can establish and refine methods to align their availability data with the Fabric and better position themselves to meet their filing obligations during the initial filing window. We urge filers to use the preliminary Fabric data to build a process to prepare their availability data and file early in the filing window. Doing so will “afford filers an opportunity to make any necessary corrections in advance of the [September 1, 2022] deadline to assure that their submission is timely filed.”<sup>24</sup> As we stated when we announced that the inaugural BDC filing window will open on June 30, 2022, “accurate and timely submission of BDC data is mandatory for covered broadband service providers,” and “Federal and state policymakers, in addition to the general public, have an urgent and compelling need for these data, particularly given they are a prerequisite to the distribution of many of the broadband deployment funds made available by Congress in the [Infrastructure Investment and Jobs Act].”<sup>25</sup>

We provide additional detail about the elements of the Fabric below, as well as guidance on how fixed broadband providers should make their data on served locations consistent with the data on broadband serviceable locations reflected in the Fabric.

### **Access to Preliminary Fabric Data**

The preliminary version of the Fabric is currently available for access by fixed broadband service providers that filed fixed broadband deployment data in past Form 477 filings.<sup>26</sup> Each company’s data

---

<sup>23</sup> Data for the five territories (American Samoa, Guam, Northern Mariana Islands, Puerto Rico, U.S. Virgin Islands) are not included in the preliminary version but will be included in the production version of Fabric.

<sup>24</sup> *BDC Filing Window PN* at 10.

<sup>25</sup> *Id.*, citing Infrastructure Investment and Jobs Act, Pub. L. No. 117-58, div. F, tit. I (2021), available at <https://www.govinfo.gov/content/pkg/BILLS-117hr3684enr/pdf/BILLS-117hr3684enr.pdf> (IIJA).

<sup>26</sup> In order to facilitate timely filing of the June 30, 2022 fixed availability data, we are only making the preliminary version of the Fabric available to existing fixed broadband service providers, which will help to streamline the licensing and approval process for accessing the preliminary data. We find that relying upon the list of fixed broadband service providers who have recently filed Form 477 data is the most efficient way of determining which existing fixed broadband service providers will gain access to the preliminary data first. We will make the production version of the Fabric data available to not only prior Form 477 fixed broadband deployment filers but also other categories of licensed users as far in advance of the June 30, 2022 opening of the BDC filing window as possible.

will contain Fabric records only for the counties that overlap the census blocks reported in the filer's Form 477 fixed broadband deployment data.<sup>27</sup>

Because some of the data sources used to create the Fabric are licensed from third-party vendors (as discussed in greater detail below), eligible fixed broadband service providers must execute a license agreement with CostQuest in order to access the data. Consistent with the Statement of Objectives issued as part of the Request for Proposals for the Fabric, the FCC's agreement with CostQuest allows for distinct sets of data rights depending upon entity type. Filers of availability data in the BDC (including fixed broadband service providers) are afforded a limited end-user license to the data provided under the contract.<sup>28</sup> CostQuest will send an email to the email address of the certifying individual of each June 2021 Form 477 filing with fixed broadband deployment,<sup>29</sup> requesting that the recipient visit CostQuest's user support help desk to (1) create user credentials, (2) submit a license request form, and (3) execute the licensing agreement. The invitation email will be sent from [support@costquest.zendesk.com](mailto:support@costquest.zendesk.com), and will provide a link that directs the recipient to the licensing support help desk.<sup>30</sup> We encourage certifying individuals of Form 477 filing with fixed broadband deployment data to add this email address to their list of known recipients or, at a minimum, monitor their spam folders and other locations for correspondence from this address.

The first step in the process after receiving an email from CostQuest will be for the entity to create a user account (a username and password) within CostQuest's user support help desk system.<sup>31</sup> Once user credentials are created, the entity may then access and complete a license request form. The individual who completes the license request form must be the same person who will sign the license agreement. The license request form will seek information needed to complete the license agreement, including the name, phone number, and email address of an administrative user who can add other users and change counties covered by the license, as well as contact information for two additional data users who should receive access to the data file. After the license request form is submitted, the user will receive a confirmation email from the same email address noted above confirming receipt of the request.

---

<sup>27</sup> Details on how to update the counties included in the service provider's dataset, including how to request data for additional counties, will be provided at a later time.

<sup>28</sup> Commission staff have reviewed the various license agreements and associated user class statements to ensure that the bargained-for data usage rights and permitted uses for each class of users are fully and accurately reflected in the documents, but have otherwise not reviewed, and do not opine upon, the commercial terms of the license agreements. Any entity eligible to execute a license agreement for access to the Fabric data does so at its own risk, without any representations or warranties from the Commission.

<sup>29</sup> CostQuest will use the email address for the Form 477 certifying individual because it represents a validated user known to the FCC. In cases where there are multiple certifying officials associated with a holding company, emails will be sent to each distinct email address; the person who requests the license and data access first via the help desk form will be sent the license to sign and other officials will be notified that someone else has submitted the form.

<sup>30</sup> We anticipate that invitations will be sent out on a rolling basis starting shortly after the release of this *Public Notice* and continuing for a period of 3-5 business days thereafter. If the Form 477 certifying official of your holding company has not received an invitation at the end of five business days following the release date of this *Public Notice* (and the invitation is not in your spam folder), then please email [NBFsupport@costquest.com](mailto:NBFsupport@costquest.com) to request an invitation. Please do not email the help desk before this time, as requests for assistance prior to the time when all invitations have been sent could potentially delay response times, license agreement processing, and other efforts to provide timely access to the preliminary data.

<sup>31</sup> If the individual who receives the email invitation is not the person who will sign the license agreement, then that individual or someone else from the company should email [NBFsupport@costquest.com](mailto:NBFsupport@costquest.com) to request that a different individual and email address receive the invitation to create a user account and complete the license request form. Note that the account created through CostQuest's user support help desk system is a unique account and not tied to any existing FCC accounts or identifiers, such as an FRN.

CostQuest will validate information submitted through the license request form and, if the submission does not contain exceptions or errors, it will be used to develop an electronically signable license agreement. The requestor will receive a link to the agreement via email from an electronic signature platform. Once the agreement is signed, the platform will provide a copy of the completed agreement to the entity, and CostQuest will prepare the service provider's preliminary data file. Once the data file has been generated, it will be posted to a secure website, and a link to download the file will be emailed to the license requestor, the administrative user, and any data users associated with the holding company (as listed in the license request form).

Any and all questions about how to access the preliminary Fabric and the license agreement associated with it should be sent to [NBFsupport@costquest.com](mailto:NBFsupport@costquest.com).

### Details of the Fabric

Beyond the data elements and functionality that already have been established,<sup>32</sup> we now have additional details on the Fabric as a result of the procurement process and consultations with the Fabric vendor. As the Commission noted in the *Third Report and Order*, “the procurement process will define what types of data and functionality are available and practical for inclusion in the Fabric.”<sup>33</sup> Specifically, the data sources that will be used by the FCC's vendor to assist in identifying the locations (including broadband serviceable locations) listed in the Fabric include a mix of satellite imagery, building footprints, address databases, land and local tax records, and other sources that the vendor finds as either necessary or beneficial for determining, as completely as possible, the locations of structures throughout the United States where fixed broadband service can be installed. This combination of data sources is consistent with feedback we received on this issue in the BDC proceeding,<sup>34</sup> and will include public, private, and proprietary data from a number of sources.

The initial production version of the Fabric will include the following data elements for each broadband serviceable location: (1) a Commission-issued unique Location ID, (2) the location's latitude/longitude coordinates, which fall within the boundaries of the structure, and (3) address data for each location, if feasible. We find that having a single Commission-issued identifier for each broadband serviceable location will be a critical element in ensuring the accuracy of the Fabric and, because it is both standardized and easily georeferenced to GIS data in the Fabric, it is the most efficient method for fixed providers to match their broadband availability data with the data in the Fabric.<sup>35</sup> Each broadband serviceable location will include data for latitude/longitude coordinates and, where feasible, an address,<sup>36</sup>

---

<sup>32</sup> *Third Report and Order*, 36 FCC Rcd at 1175-77, paras. 126-32 (“Today we adopt certain definitions and standards for use in the context of the Fabric.”); *Second Order and Third Further Notice*, 35 FCC Rcd at 7484, para. 54 (stating that “the Fabric will consist of a single, nationwide fabric that will contain geocoded locations for all locations where a broadband connection can be installed”).

<sup>33</sup> *Third Report and Order*, 36 FCC Rcd at 1177, paras. 132.

<sup>34</sup> See USTelecom/WISPA Reply at 14-16 (stating that “Joint Commenters have long supported the inclusion of all relevant data as a means of improving the ability to understand where broadband is available, particularly over time”); Massachusetts Dept. of Telecom. and Cable Comments at 4 (“Collecting geospatial data from a variety of third parties both initially and on an ongoing basis would minimize the resources required to build and maintain a fabric while creating a useful set of standards for the same. As soon as practicable, the FCC should begin to identify public sources of location data and encourage any third party with existing geospatial data to submit such data.”); National States Geographic Information Council (NSGIC) Comments at 3-7 (advocating for the use of publicly available address data); Letter from B. Lynn Follansbee, VP-Policy & Advocacy, USTelecom, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 19-195, at 3 (filed Aug 14, 2020) (USTelecom Aug. 14, 2020 *Ex Parte* Letter) (advocating for the use of land-use and tax-assessment data, address data, and third-party data).

<sup>35</sup> See, e.g., Connected Nation Comments at 3 (“Ensure that each ‘serviceable location’ (i.e., the specific latitude and longitude of an identified location that warrants service delivery) on the Fabric has a unique identifier (such as an ID number), as well as a corresponding physical street/road address.”).

so that providers can identify the broadband serviceable location to which the Location ID applies. The production Fabric will further include data indicating whether a location is residential, non-residential, or both residential and non-residential; an estimated unit count for the location; and additional information to help filers associate Fabric points with their data. Fixed service providers that submit list-based broadband availability data must associate each of their broadband serviceable locations to a specific Location ID. Using the Location ID as the required data element for identifying broadband serviceable locations will greatly simplify the use of the Fabric by filers, the Commission, and other stakeholders and will ensure more accurate availability data because providers will not have to match or include any other variables, including addresses, when making their broadband availability filings.<sup>37</sup> As several commenters noted in the docket, the use of addresses to identify a location are subject to various inconsistencies arising from address variances,<sup>38</sup> and use of the Location ID will eliminate such inconsistencies from the Fabric process. Filers should be aware that the Location IDs in the preliminary version of the Fabric will not be the same as the Location IDs in the production version of the Fabric.<sup>39</sup> Consequently, we encourage filers to use the preliminary version of the Fabric to gain an understanding of the format of the Fabric data and the elements that are or will be included in it, and to develop processes for conforming their data with the Fabric. For this reason, CostQuest will only provide support for licensing and accessing the preliminary data, at least until such time as the production version of the Fabric is made available to filers. Additionally, filers will need to run any processes developed using the preliminary data with the production data when it becomes available in order to prepare their fixed availability data for submission during the initial BDC filing window.

### **Fixed Broadband Service Provider Availability Reporting Requirements**

As noted above, fixed broadband service providers that do not report using availability polygons must submit their broadband availability data using Location IDs that match the unique Commission-issued Location IDs in the production version of the Fabric. The Location ID, with its corresponding coordinates, is the simplest and most efficient way for providers to georeference their broadband availability to location data in the Fabric.

Fixed providers will have access to the preliminary version of the Fabric immediately, subject to the process described above, and to the production version of the Fabric as far in advance of June 30, 2022, as feasible. We note that fixed providers will have the ability to challenge any broadband serviceable location data in the production version of the Fabric that they believe is in error, and we will provide details on the process for these challenges in a later Public Notice. We anticipate opening the

(Continued from previous page) \_\_\_\_\_

<sup>36</sup> Not all broadband serviceable locations will have a valid U.S. Postal Service street address. For reporting in the High Cost Universal Service Broadband database (HUBB), we addressed this issue by requiring submitters to enter “whatever information they have that could be used to find the location on a map or in person, such as the intersection of two roads, the block segment, or the distance from a nearby landmark.” See *Wireline Competition Bureau Provides Guidance to Carriers Receiving Connect America Fund Support Regarding Their Broadband Location Reporting Obligations*, WC Docket No. 10-90, Public Notice, 31 FCC Rcd 12900 (WCB 2016). We reiterate that guidance here for providers submitting addresses as part of their broadband availability filings.

<sup>37</sup> US Telecom Aug. 14, 2020 *Ex Parte* Letter at 2 (noting that once the Fabric is complete, the identifier (including the geocoordinates) for each location becomes the standard for evaluating any broadband data).

<sup>38</sup> See USTelecom/WISPA Comments at 18-19 (stating “that while an address is helpful as an informative reference and is the plain language way of describing a location and determining whether a structure is a separate location, addresses are textual and thus can be inconsistent as a label for a location, and therefore an address does not necessarily serve as an accurate descriptor of where a location actually exists”); WTA Comments at 5 (“Whereas polygon shapefiles and geographic coordinates are generally available, there are no usable street addresses for some rural ‘locations.’”).

<sup>39</sup> Each Location ID in the production version of the Fabric will be a ten-digit number starting with 1. However, in the preliminary Fabric dataset, each Location ID will be ten-digit number starting with 9. The Location IDs from the preliminary Fabric will not be accepted by the BDC system.

window for bulk challenges to the Fabric data contemporaneously with the close of the filing window on September 1, and will begin accepting individual challenges to Fabric locations contemporaneously with our publication of the broadband maps.

Filers seeking to submit lists of addresses or locations, as opposed to submitting availability polygons, will need to match their location data to locations in the Fabric. Requiring fixed providers to associate their location availability data to the Commission-issued Location IDs in the Fabric is consistent with the BDA and the record in this proceeding.<sup>40</sup> Requiring filers to submit the Commission-issued Location ID for each of their broadband serviceable locations ensures that the Commission will collect fixed availability data that “can be georeferenced to the data in the Fabric” and will result in a more accurate and complete broadband locations database.<sup>41</sup>

As stated above, we urge providers of fixed broadband service to access the preliminary dataset as soon as possible. Filing broadband availability data based upon the Fabric is a new process, so we expect that it will take providers some time to work through their methodology for aligning their internal served location data with the Fabric, and then to generate the data required for filing in the BDC system.<sup>42</sup> While we understand that fixed providers cannot produce their broadband availability data as of June 30, 2022 prior to that date, establishing and testing a methodology and processes to create such data will take time and resources, and can be started now. Given that the Commission has already made clear “that any requests for waivers or extensions of the filing deadline will ‘face a high hurdle even at the starting gate,’”<sup>43</sup> we urge fixed broadband service providers to begin this process as quickly as possible.

Fixed broadband service providers that submit availability polygons to report their availability must ensure that their polygons include, and only include, the locations in the Fabric to which the filer is providing service or those to which it could provide service with a “standard broadband installation” as defined in our rules.<sup>44</sup> Since this is also a new process, we urge providers planning to file BDC data using availability polygons to start the work of preparing those polygons and ensuring they meet the requirements adopted by the Commission. As noted above for providers planning to file broadband availability data using the Fabric, the Commission has made it clear that “any requests for waivers or extensions of the filing deadline will ‘face[] a high hurdle even at the starting gate’ and that a failure to timely file required data in the new BDC system may lead to enforcement action and/or penalties as set forth in the Communications Act and other applicable laws absent circumstances beyond a filer’s control.”<sup>45</sup>

---

<sup>40</sup> See *Broadband DATA Act*, 47 U.S.C. §642b(2)(A)(iii); *Third Report and Order*, 36 FCC Rcd at 1175, para. 126 (addressing comments of USTelecom and WISPA urging the Commission to reflect locations as a single point, defined by both geographic coordinates and street addresses).

<sup>41</sup> See 47 U.S.C. § 642(b)(2)(A)(iii); see also FCC, *Broadband Data Collection: Data Specifications for Biannual Submission of Subscription, Availability, and Supporting Data* at § 6.1 (Fixed Broadband Availability Location Lists) (rel. Mar. 24, 2022), <https://us-fcc.box.com/v/bdc-availability-spec> (Broadband Data Collection Availability Data Specifications) (providing the data elements that fixed broadband service providers must include in location-list-based availability reporting).

<sup>42</sup> See generally *Broadband Data Collection Availability Data Specifications*.

<sup>43</sup> See *BDC Filing Window PN* at 9-10.

<sup>44</sup> See 47 CFR §§ 1.7004(c)(1), 1.7001(a)(19).

<sup>45</sup> *BDC Filing Window PN* at 9-10.



Questions about how to access the preliminary Fabric and about the license agreement associated with the Fabric should be addressed to [support@costquest.zendesk.com](mailto:support@costquest.zendesk.com). For other information about the preliminary version of the Fabric or the Broadband Data Collection, please visit the Broadband Data Collection Help Center at <http://help.bdc.fcc.gov>.

– FCC –