



PUBLIC NOTICE

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BROADBAND DATA TASK FORCE ANNOUNCES RECOMMENDED BEST PRACTICES FOR CHALLENGES TO UPDATED BROADBAND SERVICEABLE LOCATION FABRIC

WC Docket Nos. 11-10 and 19-195

By this Public Notice, the Broadband Data Task Force (Task Force) announces recommended best practices for submitting bulk challenges to the most recent version of the Broadband Serviceable Location Fabric (Fabric) data. The Task Force also provides notice that bulk Fabric challenges submitted as much in advance of **March 15, 2023**, as possible are most likely to be reviewed and adjudicated in time to be accounted for in the next iteration of the Fabric (version three) to be released in conjunction with the Broadband Data Collection (BDC) filing window for data as of June 30, 2023 that is due no later than September 1, 2023. Bulk Fabric challenges submitted after March 15, 2023, will still be accepted and reviewed on a rolling basis, however, they would likely be adjudicated as part of a future version of the Fabric.¹

On December 27, 2022, the Task Force announced that an updated version of the Fabric (version two) would be made available in conjunction with the opening of the BDC filing window on January 3, 2023.² Fabric data is associated with a relevant “as-of” date for fixed broadband availability data reporting, and we therefore release each updated iteration of Fabric data in conjunction with the opening of a BDC filing window for reporting broadband availability as-of June 30 or December 31 of each year. Version two of the Fabric data serves as the foundation upon which fixed broadband availability data as of December 31, 2022, must be reported no later than March 1, 2023.³

¹ NTIA, under its authority under the Bipartisan Infrastructure Law, continues “to target June 30 as the date by which [it] will allocate each state and territory’s BEAD Program funding for high-speed Internet service.” <https://ntia.gov/blog/2023/advancing-internet-all>. The Commission continues to accept challenges to the Fabric and broadband availability data on a rolling basis as contemplated by the Broadband DATA Act, the Commission’s rules, and the Bipartisan Infrastructure Law. See Broadband Deployment Accuracy and Technology Availability Act, Pub. L. No. 116-130, §802(b)(5)(C), 134 Stat. 228 (2020) (codified at 47 U.S.C. § 642(b)(5)(C)); 47 CFR § 1.7006(d); Infrastructure Investment and Jobs Act, Pub. L. No. 117-58, § 60102(h)(2)(E)(i), 135 Stat. 429 (2021) (codified at 47 U.S.C. § 642(b)(5)(C)(i)). The results of availability challenges will be updated on the National Broadband Map (NBM) as soon as they are resolved. The results of location challenges to Fabric version two are expected to be reflected in the Map by November 2023.

² *Broadband Data Task Force Announces Opening of the Second Broadband Data Collection Filing Window*, WC Docket Nos. 19-195, 11-10, Public Notice, DA 22-1372 (WTB/WCB/OEA Dec. 27, 2022). Version two of the Fabric contains data from additional data sources and other improvements by the FCC and CostQuest, as well as the results of bulk Fabric challenges submitted by state and local governments and broadband providers on or before November 10, 2022.

³ The FCC will publish the December 31, 2022 broadband availability data, reported and overlaid on to version two of the Fabric, in an update to the NBM in the spring.

As of January 3, 2023, the BDC system only accepts bulk Fabric challenges based upon the data in version two of the Fabric.⁴ Any bulk challenges to version one of the Fabric that were filed between November 11, 2022, and January 2, 2023, are being “carried over” and reviewed and adjudicated against version two, and therefore do not need to be refiled; bulk challenges submitted on or after January 3, 2023 however, must be submitted against version two of the Fabric.

Bulk Fabric challengers should submit their challenges to version two of the Fabric as soon as possible and, in any case, **no later than March 15, 2023**, to have the best opportunity to be considered in time for preparation of the next version of the Fabric (version three). Bulk Fabric challenges submitted after March 15, 2023, are unlikely to be considered for version three of the Fabric and will instead be reviewed and adjudicated as part of a future iteration of the Fabric.

Based on our review of the bulk challenges submitted to version one of the Fabric, we reiterate here some of our guidance to assist filers with reviewing Fabric data to assure that filers do not submit challenges seeking to add locations that are already reflected in the Fabric (i.e., “Type 1” Fabric challenges). As we have previously emphasized, the Fabric is a dataset created by analyzing numerous input data sources to derive geographic coordinates for building footprints (i.e., structures) that the FCC has determined are broadband serviceable locations (BSLs). It is therefore important to reiterate that the Fabric is not a database of addresses, and that address data, while included in the Fabric where available, are an unreliable determinant of the precise geographic coordinates of structures where broadband service can be installed.

Preparing a bulk Fabric challenge is fundamentally a geospatial process. Entities therefore should not attempt to upload as a bulk Fabric challenge a list of addresses they have compiled for another purpose (e.g., a list of addresses from a billing system or from an E911 database), though these datasets can serve as a helpful starting point for producing a valid bulk Fabric challenge. As an initial step, challengers can attempt to join this type of address-based data to the address information included in the Fabric in order to associate unique Fabric location IDs with the locations in the prospective challenger’s data.⁵ But the challenger should not simply upload as a challenge all of the data it is unable to match to an existing location ID using an address matching join. In other words, the fact that an address is missing from the Fabric does not necessarily indicate that the location is missing from the Fabric.⁶

⁴ The Fabric data currently displayed on the NBM are version one data, which form the foundation upon which ISPs reported their service availability as of June 30, 2022. Individuals submitting location challenges from the NBM will continue to submit challenges to those Fabric data. See FCC, *Which Version of the Fabric Should I Use?* (Jan. 3, 2023), <https://help.bdc.fcc.gov/hc/en-us/articles/11749189297947-Which-Version-of-the-Fabric-Should-I-Use-> (“[i]ndividual challenges to both location and availability data, which are submitted directly using the National Broadband Map challenge interface, will also continue to be based on [version one] of the Fabric until the December 31, 2022, availability data are published.”). Individual challenges from the NBM will be reviewed and aligned with updates CostQuest has made in version two of the Fabric and bulk challenges to version two data.

⁵ We have previously provided guidance on how to perform this joining process, including tools for attempted “fuzzy matching” of addresses. FCC, *Broadband Serviceable Location Fabric Overview for Fixed Availability Data Filers* (Sept. 28, 2022), <https://help.bdc.fcc.gov/hc/en-us/articles/7780065291291-Video-Broadband-Serviceable-Location-Fabric-Overview-for-Fixed-Availability-Data-Filers> (May 2023 Fabric Tutorial Video); see also FCC, *Address Matching in Excel* (Sept. 12, 2022), <https://help.bdc.fcc.gov/hc/en-us/articles/6810008518427-Address-Matching-in-Excel-> (last visited Jan. 17, 2023).

⁶ We remind challengers that the Commission treats multi-tenant environments as single BSLs in the Broadband Data Collection. *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, 1177, para. 130 (2021). Accordingly, challengers should not seek to add additional units as BSLs. See FCC, *Fabric FAQs* (Jan. 10, 2023), <https://help.bdc.fcc.gov/hc/en-us/articles/7412732399003-Fabric-FAQs> (“[i]n the case of multiple housing units within a single structure on a single parcel, the location will have a single entry or record in the Fabric that corresponds to a set of coordinates within the structure.”); FCC, *Bulk Fabric Challenge FAQs* (Dec. 6, 2022), <https://help.bdc.fcc.gov/hc/en-us/articles/9200359586971-Bulk-Fabric-Challenge-FAQs> (“[y]ou might have an

Rather than simply filing a Type 1 challenge consisting of a list of addresses, the challenger should next proceed to a geospatial analysis of both its address data and the data included in the Fabric. The challenger should start by loading the Fabric data into a geospatial analysis tool.⁷ Loading additional datasets—including not only datasets such as billing system data and E911 data, but also additional datasets, such as building footprint imagery data and road data—will allow filers to improve the quality of any challenges.⁸ After uploading their data sources, filers should undertake a geospatial process to eliminate locations from a challenge that are likely already designated as BSLs in version two of the Fabric and focus on the remaining locations. For example, filers should eliminate any points that fall within a set buffer distance of an existing location point in the version two Fabric data.⁹ Filers should also eliminate any location data that falls on a road or that falls outside of a building footprint.¹⁰ They can then perform a more detailed review of the remaining points to determine whether a Fabric challenge is warranted (and, if so, what category of challenge should be submitted). For any locations included in the challenger's data that are not included in the version two Fabric data, filers should format challenges as a .csv file. Importantly, when including address information with a bulk Fabric challenge (either as a Type 1 challenge to add a BSL or a Type 2 challenge to change the address data for an existing Fabric location), filers will also need to run their address information through USPS CASS validation to ensure the challenge is not rejected through the FCC's review process.¹¹

As a reminder, entities that had previously entered into a license agreement with CostQuest received an email from CostQuest on or around December 30, 2022, providing them with a link to download version two Fabric data in their covered areas.¹² Entities that have not yet entered into a license agreement with CostQuest for Fabric data (including internet service providers, state, local or Tribal governmental entities, or other entities wishing to use the Fabric data for purposes of participating in the BDC) may do so by following the instructions the Task Force has provided for obtaining access to the Fabric.¹³

address for an individual unit or substructure that is part of a larger building, such as a condo or apartment, that is already identified as a BSL in the Fabric. If you drop the unit/apartment number from your address and the remaining part of the address (the street number and street name) matches to a location in the Fabric, there is no need to file a challenge.”).

⁷ One such tool is QGIS, a free, open-source mapping tool. QGIS, *A Free and Open Source Geographic Information System*, <https://www.qgis.org/en/site/> (last visited Jan. 17, 2023); see also May 2023 Fabric Tutorial Video at 19:15 (providing step-by-step instructions on how to map Fabric data using QGIS).

⁸ Open-source satellite imagery data is available from resources such as Google Maps or OpenStreetMap. Google, *Google Maps*, <https://maps.google.com/> (last visited Jan. 17, 2023); OpenStreetMap, *OpenStreetMap*, <https://www.openstreetmap.org/> (last visited Jan. 17, 2023). Road data is available for download from the U.S. Census Bureau. U.S. Census Bureau, *TIGER/Line Shapefiles* (December 5, 2022), <https://www.census.gov/geographies/mapping-files/time-series/geo/tiger-line-file.html>.

⁹ If your data for a location did not match to an existing location ID in the Fabric through your address matching process but is in close geographic proximity to an existing BSL point in the Fabric, then you may still want to submit a Fabric challenge. But the category of the challenge may be to, e.g., change the address for the location, rather than to add a BSL to the Fabric.

¹⁰ Geographic coordinates for a Fabric challenge point must fall within a building footprint in order to be upheld as a successful Fabric challenge. As a result, if a set of geographic coordinates submitted by a challenger either falls in the middle of a road or otherwise falls outside of a building footprint, then the challenge is likely to be rejected.

¹¹ USPS, CASS, <https://postalpro.usps.com/certifications/cass> (last visited Jan. 17, 2023).

¹² CostQuest sent an email from nbfsupport@costquest.com to the Certifying Official identified in the Entity Information page of your BDC system registration providing a link to the updated data file.

¹³ See *Broadband Data Task Force Announces the Availability of the Production Version of the Broadband Serviceable Location Fabric*, WC Docket Nos. 11-10, 19-195, Public Notice, DA 22-668 (BDTF/WCB/OEA June 23, 2022). See also FCC, *Access the Fabric*, <https://help.bdc.fcc.gov/hc/en-us/sections/10419330460827-Access->

For additional information and questions regarding the Broadband Data Collection, please visit the BDC website at <https://www.fcc.gov/BroadbandData>.

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