

**Congress of the United States**  
**Washington, DC 20515**

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May 6, 2019

The Honorable Ajit Pai  
Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

Dear Chairman Pai:

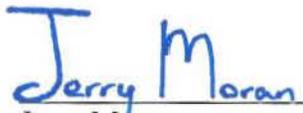
We write regarding the Federal Communications Commission's (FCC) ongoing efforts to improve the accuracy of its Form 477 collection of voice and broadband subscription and deployment data. As the principal tool used by the FCC to gather data on communications services to inform policymaking, the current Form 477 data collection processes fall short in depicting where fixed and mobile broadband services are available or lacking, with one of the most extreme examples of inaccuracy found in our home state of Kansas. This is especially problematic because this data is used to determine where billions of federal dollars are allocated for broadband deployment. As such, we encourage the FCC to address concerns related to the precision of this critical data collection that informs federal funding so important to our rural communities, and prevents the overbuilding of existing broadband networks.

The FCC's current broadband availability maps, particularly in the context of fixed broadband access shown by the National Broadband Map, do not utilize data that is granular enough to adequately depict broadband availability in rural communities. Form 477 data collection policies dictate that an entire census block be considered served with broadband service even if that service is only offered to one location within the census block. Since census blocks in rural communities are larger than their urban counterparts, rural communities are particularly threatened by this policy. As a result, Kansas communities could be denied eligibility to participate in existing federal funding programs for broadband deployment regardless of their actual need. With methods such as shapefile format submissions already used to increase granularity of mobile broadband availability depictions, the federal government should consider every tool at its disposal to improve the granularity of all broadband maps.

Additionally, the validation of data submitted to broadband availability databases needs to be bolstered. As the FCC takes steps to improve the quality of broadband availability maps, it should seriously consider verification mechanisms that extend beyond the self-certification of initial data submissions by providers. The Mobility Fund Phase II initial eligibility map highlighted the issues of relying on self-reported data indicating broadband availability in Kansas, but it also demonstrated the importance of a robust and meaningful challenge process, which required significant time and resources of the challenging parties. Therefore, standardized validation of broadband availability, including a challenge process that allows independent entities to participate, is vital to any data collection that affects the distribution of federal resources for broadband deployment.

Many Kansans' access to affordable and reliable broadband services relies on federal programs that distribute resources for deployment, like the programs administered within the FCC's Universal Service Fund. But if the information that the federal government uses is not specific or accurate, the agencies administering these programs are not equipped to make appropriate decisions. In the interest of effectively allocating federal resources to unserved and underserved communities, we urge the FCC to take immediate action to improve the granularity and accuracy of broadband availability maps, especially as new broadband funding initiatives like the Rural Digital Opportunity Fund are rolled out. Thank you for your attention to this important matter.

Sincerely,

  
Jerry Moran  
United States Senator

  
Pat Roberts  
United States Senator

  
Roger Marshall, M.D.  
Member of Congress

  
Sharice L. Davids  
Member of Congress

  
Steve Watkins  
Member of Congress

  
Ron Estes  
Member of Congress