

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

May 14, 2019

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

Dear Chairman Pai:

We are writing to you regarding the Federal Communications Commission's ongoing review of its fixed and wireless broadband availability maps. As the Commission contemplates future Universal Service Fund (USF) support mechanisms that could directly affect broadband deployment in unserved and underserved areas in Michigan, we urge you to carefully address the Commission's broadband availability maps.

The Commission's broadband availability maps are based largely upon whatever information may be received from providers through its Form 477 survey data collection. Although the FCC's database may represent the most consistent data collection mechanism and provide a complete repository of such information available today, there are several problems with the current maps. Specifically, the maps are not granular enough; in the context of fixed broadband, an entire census block will appear as served even if service is offered to only one location within that census block. This can result in denial of USF funding in such areas, leaving many locations without essential broadband service simply because they share a census block with a household considered as served. We are additionally concerned that the provider-originated reports used to compose these maps are largely *unvalidated*. The providers must certify the accuracy of their submitted reports, but the information verification processes used before funding or financing determinations are made can significantly vary—or, in many cases, such processes do not exist at all. Furthermore, these processes can be very costly and expensive, especially for smaller providers who are most likely to benefit from more granular maps. If funding or financing decisions flow directly from the maps, we must ensure they are sufficiently accurate, granular, and up to date.

We are writing to ask the FCC to continue to take steps to address these concerns. First, it is critical that the FCC to develop a more granular and standardized reporting process to demonstrate broadband availability—while also balancing the burdens of reporting, especially for smaller providers. It is additionally important to ensure separately and distinctly the accuracy of that more granular data, including data held by interagency partners at the National Telecommunications and Information Administration or the U.S. Department of Agriculture. As the Mobility Fund experience indicated, reliance only upon self-reported data has presented challenges for the agency, and flawed data has directly impacted the ability of rural broadband

providers to deploy service to new areas. We therefore encourage the FCC to establish a robust and meaningful challenge process that will enable better validation of both fixed and mobile data *prior* to relying upon such data in making funding or financing decisions, and working with other Federal agencies to coordinate such efforts.

Access to affordable, reliable broadband is critical for the business, educational, health care, and other daily needs of Michiganders. Our constituents should not be left behind in the 21<sup>st</sup> century digital economy due to flawed broadband availability maps. Thus, it is critical to ensure inaccurate information will not result in a denial of access to fixed or mobile broadband support. A validated set of data based upon standardized methods of granular reporting will help better achieve universal service.

Thank you for your attention to this issue. I look forward to working with you as the FCC continues working to ensure all Americans have access to robust, reliable, and affordable broadband.

Sincerely,



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Tim Walberg  
Member of Congress



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Jack Bergman  
Member of Congress



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Paul Mitchell  
Member of Congress



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John R. Moolenaar  
Member of Congress



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Bill Huizenga  
Member of Congress



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Elissa Slotkin  
Member of Congress

cc: The Honorable Michael O'Rielly  
Commissioner, Federal Communications Commission

The Honorable Brendan Carr  
Commissioner, Federal Communications Commission

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The Honorable Jessica Rosenworcel  
Commissioner, Federal Communications Commission

The Honorable Geoffrey Starks  
Commissioner, Federal Communications Commission