

**STATEMENT OF  
COMMISSIONER GEOFFREY STARKS,  
CONCURRING**

Re: *Establishing the Digital Opportunity Data Collection*, WC Docket No. 19-195;  
*Modernizing the FCC Form 477 Data Program*, WC Docket No. 11-10.

It has been nearly six months since the COVID-19 pandemic reached the United States. In that time, our way of life has been transformed. For millions of Americans, work duties, educational resources, and healthcare have all moved online. Our networks have, accordingly, faced unprecedented demand—but not from the millions of others who do not have high quality broadband at home. From the widespread imposition of stay-at-home orders to the anticipated need for remote instruction from many schools in the fall, we have more than enough evidence that we must address the digital divide now.

To meet that challenge, we must have accurate data. As I have said many times, we are leaving real people behind—knowingly—when we make funding decisions based on data that blinds us to the reality of internet inequality in many places. Earlier this year, I argued against spending three-quarters of the Rural Digital Opportunity Fund based on our existing, flawed data. I will continue to oppose efforts to rush the 5G Fund out the door without first fixing our maps. We have for years spent and, because of RDOF, will for the next decade spend, billions and billions of dollars without a comprehensive understanding of where broadband is and is not. Without doubt, today marks the beginning of the end of that era.

Though I wish we had acted sooner, I am glad that Congress created a clear deadline and expectations in the Broadband DATA Act. Today's Order is an important step on the path Congress has laid out. I appreciate the efforts of the many parties that proposed refinements to the reporting standards we adopt today. I was particularly concerned that the buffer size proposed in the draft Order was incompatible with industry standards for rural fiber deployment and might inadvertently increase the costs by encouraging the use of unnecessary aggregation points. The version we adopt today better reflects the capabilities of today's rural fiber networks. I am also pleased that we establish mapping parameters for 5G-NR services. We will soon need that data to ensure that all Americans share the benefits of the 5G future.

Still, our work is not complete, and the Broadband DATA Act requires more than rules the Commission adopts today. In particular, Congress has mandated rigorous challenge and verification processes, and we will need robust engagement from parties in the coming weeks to finalize those procedures before the statutory deadline. I will be particularly focused on suggestions for improving our coordination with state and local governments. Those entities have provided a badly needed check in our past challenge processes. We will need their assistance, and it is regrettable that we did not move sooner to fulfill our statutory obligations under the Broadband DATA Act. The result, I fear, will require those parties—and all interested parties—yet again to act fast with their backs against the wall and billions of federal dollars at stake.

Once these rules are established and the Broadband DATA Act's deadlines are satisfied, we must keep the urgency. Solving internet inequality requires a clear and complete understanding of the challenges we face—something we will not have until revised maps are released.

I thank the staff from across the Commission who came together to produce this detailed and comprehensive item.