

July 29, 2022

The Honorable Jessica Rosenworcel  
Chairwoman  
Federal Communications Commission  
45 L Street NE  
Washington, D.C. 20554

Dear Chairwoman Rosenworcel:

We write to you to share our deep concerns about the Federal Communication Commission's (FCC) Broadband Serviceable Location Fabric (the fabric) mapping project in our home state of Alaska. Since the enactment of the Infrastructure Investment & Jobs Act (IIJA) – which we both supported and were key contributors to – we have sought to educate various federal officials about the unique challenges Alaska faces building out broadband infrastructure. We appreciate that you have visited the state several times

From our perspectives, it cannot be understated how transformative affordable and reliable broadband access will be to Alaska. Over 80 percent of our state is off the road system and as a result, internet access is the true link for many Alaskans to the 21<sup>st</sup> Century economy. From access to telehealth and digital education, broadband access is essential to participate in today's economy. That is why it is imperative that we get the deployment of the IIJA's broadband programs right for Alaska. As a result, we ask for your due consideration of our concerns related to the development of Alaska's fabric.

Under the Broadband Data Act of 2020, the FCC is tasked with creating the fabric. It is the FCC's responsibility to ensure that the fabric provides an accurate property-by-property level dataset for locations that could be served by the internet.

As you know, the fabric map's initial release occurred on June 30, 2022, and it is a foundational piece to how the Broadband Equity, Access & Deployment (BEAD) Program funds will be allocated to states. Alaska's BEAD allocation relies on accurate mapping of all broadband serviceable locations in Alaska, and subsequent identification of unserved locations. However, Cost Quest's mapping methodology for the fabric relies on foundational data such as property tax records, which do not exist in many areas of Alaska.

At the state level, Alaska does not maintain property tax records because there is not a statewide property tax, rural boroughs do not maintain robust parcel data, and there is not centralized property data for Alaska's rural communities. Additionally, Alaska's fabric faces unique challenges due to its vastness and rural geography. We understand developing Alaska's fabric in this context is no small task, and appreciate the complexity of trying to differentiate and determine the locations across the state as either served, unserved, or even serviceable at all. However, we believe this is all the more reason why your offices should grant special accommodations for Alaska's fabric.

Beginning as early as March 2022, numerous stakeholders including the Congressional Delegation, State of Alaska, Alaska Telecom Association, and Alaska's telecommunications providers have on at least eight separate occasions attempted to alert the FCC, and thereby Cost Quest, to Alaska's mapping challenges. We appreciate the time and attention of your office during these interactions, but are deeply concerned that little to no remedial action has resulted from them. We remain concerned that the FCC and Cost Quest did not adequately collaborate with the State and providers to identify additional sources of data collection. More time and attention needs to go into working through the commercial and data sharing hurdles in order to acquire the necessary data, whether that be satellite imagery or otherwise.

Based on the feedback that we have received from Alaska's carriers since the initial fabric was released, these concerns appear to be well founded. For example, the data shows at least 69 communities with zero locations in the fabric, almost 100 are showing less than 25% of the housing units counted in the 2020 census, and at least 68 are showing less than 50% of housing units. One carrier previously estimated that the data was counting about 12 percent of their locations. There are also large areas where many individual family dwellings are being counted as only a handful of multi-dwelling units. In addition, many of the locations that are included in the fabric are lacking proper address data such as directional indication or suffixes.

In subsequent conversations with FCC staff, we were alerted to the fact that Cost Quest would attempt to procure aerial imagery from overflights of the state. While potentially beneficial, this effort is wrought with significant logistical hurdles. Finally, we heard that by the end of May, Cost Quest had essentially halted attempts to try and procure new data sources for Alaska and would be publishing the maps for the initial fabric as-is. During this time, Congressional Delegation staff was assured that the production maps would be more accurate than the preview version and would incorporate borough data for the entire state. We now know that the production maps are far from accurate and that our concerns persist.

Due to these concerns, we respectfully request the following:

- (1) That the State of Alaska and Alaska's carriers should be allowed to provide the FCC and Cost Quest supplemental data (including the carrier's proprietary (Form 477) coverage maps) to augment and be incorporated into Cost Quest's data before the final maps are released on September 1;
- (2) That the FCC and Cost Quest will work with Alaska's stakeholders to devise methods to procure more accurate data and work to accept supplemental data if there are licensing or other hurdles; and
- (3) That due to the significant deficiencies that persist in the production maps released on June 30, 2022, the FCC shall not release the final maps for use by any agency for the purposes of calculating grant awards before resolving these deficiencies through the challenge process or otherwise.

In addition to the above requests, we seek your assurance and commitment that the fabric challenge process will provide a robust process to Alaska as it seeks to remedy deficiencies in the initial fabric release. We are deeply worried that since Alaska's fabric still seems woefully inaccurate, the challenge process could take a significant amount of time while other states receive their allocations and drain the pot of available BEAD funds. This strikes us as a potential uniquely

unjust outcome. Across the board, Alaska is already playing catch up on infrastructure. We worked hard in the IJA to make sure that Alaska's unique interests were adequately accommodated. We hope that you share our concerns and will take the necessary steps to address them.

Thank you for your consideration of these requests. Please follow up with our staff as soon as possible to provide an update on what actions will be taken to remedy the situation.

Sincerely,



Lisa Murkowski  
United States Senator



Dan Sullivan  
United States Senator

cc:

Secretary of Commerce, Gina Raimondo  
Assistant Secretary of Commerce, Alan Davidson  
Commissioner Geoffrey Starks  
Commissioner Brendan Carr  
Commissioner Nathan Simington