September 2, 2022

The Honorable Lisa Murkowski
United States Senate
522 Hart Senate Office Building
Washington, DC 20510

Dear Senator Murkowski:

Thank you for your letter regarding the Federal Communication Commission's Broadband Serviceable Location Fabric and the unique challenges associated with reporting broadband availability in Alaska. Broadband service is vital for school, work, healthcare, and more, and data consistently shows that too many in the United States, and particularly Alaska, do not have access to broadband today. That's why I share your commitment to ensuring that Alaskans can access high-speed, reliable broadband service no matter where they live.

As Congress recognized with the passage of the Broadband DATA Act, the first step necessary to connect all Americans is to develop accurate information about where broadband service is and is not available across the country. The maps created through the FCC's Broadband Data Collection (BDC) will provide a comprehensive, standardized, highly granular location-by-location map of broadband availability nationwide. With better data we can more precisely target our policymaking efforts and financial resources, including the FCC's universal service funding and the grant projects included in the recently enacted Bipartisan Infrastructure Law, to areas where support is needed most. Better data will also help other federal agencies, state and local governments, and Tribal entities target their own broadband mapping and deployment efforts.

Since securing funding to implement the Broadband DATA Act, the Commission has been hard at work standing up the new BDC system and processes and conducting the procurements necessary to ensure that the complex and interrelated systems that will comprise the BDC can launch quickly and perform effectively. In June 2022, the Commission reached a major milestone on the path to gathering more granular data when it opened the inaugural BDC filing window. As a result, starting on June 30, 2022, facilities-based providers of fixed and mobile mass-market broadband Internet access service were able to file data about where they make these services available. This filing window just closed on September 1, 2022.

Providers of fixed service in particular will file broadband availability data based on a dataset of broadband-serviceable locations (BSLs) contained in the Broadband Serviceable Location Fabric (Fabric)—a common dataset of all locations in the United States where fixed broadband internet access service can be installed. This dataset is the product of integrating a wide-range of different data sources, including, to the extent available, address records, tax assessment records, imagery and building footprints, Census data, land use records, parcel boundaries, geo-spatial road and street data. While not all of these data sets are available in

every state, including Alaska, it is worth noting that our old broadband maps lacked any of this location-specific information.

During this process, the Commission has worked with Internet service providers (ISPs) and state, local, Tribal, and federal stakeholders to improve the BDC system and make the inaugural filing process as seamless as possible. For example, the Commission worked with its Fabric contractor, CostQuest, to make a preliminary version of the Fabric available to fixed ISPs in April 2022, to assist them in understanding the Fabric's format and to help them in executing license agreements for access to the Fabric in advance of the opening of the filing window. On June 23, 2022, the FCC made a production version of the Fabric available to fixed providers and state, local and Tribal governments to use when filing availability data, which included a more definitive set of BSLs. The production version of the Fabric is significantly more inclusive (in terms of number of locations in Alaska) than the preliminary April version of the Fabric. The production Fabric includes locations for every borough and census area in Alaska, unlike the April version, and includes a large increase in locations in rural boroughs/census areas (CAs). For example, when we exclude the four most populated boroughs/CAs, the number of locations in Alaska increased by 43 percent.

Work to further improve the Fabric is ongoing and in fact, consistent with the design of the Broadband DATA Act. Under the law, the BDC is iterative and will continue to incorporate additional data about BSLs throughout the country. To this end, stakeholders like the State of Alaska and Alaska ISPs can assist by participating in the bulk Fabric challenge process that begins in September. In other words, they can use this process to let us know what we got wrong and right in the Fabric and how we can improve it to better reflect experience on the ground. This is especially important for rural and remote communities that are more difficult to map, including Alaska.

With respect to Alaska specifically, CostQuest has continued its efforts to improve the data for the state so that the coming version of the Fabric will be even more improved. To this end, CostQuest is already at work to incorporate more data sources reflecting the state, including High-Cost Universal Broadband (HUBB) data, LIDAR data, and additional satellite data and manual visual verifications. For example, satellite data for over 400 Alaska communities are being visually examined to identify additional building footprints and then subjected to a secondary analysis to determine which of those buildings meet the Commission's definition of a BSL. Similarly, CostQuest has reviewed roughly 45,000 locations in Alaska reported by ISPs in the HUBB system to extract BSLs that were not included in the earlier version of the Fabric. These careful efforts, which are adding BSLs in areas where the prior version of the Fabric had few or none, are resulting in substantial improvements in the next version of the Fabric. In addition, new aerial imagery flyovers of Alaska are already underway, which will provide us with a new, up-to-date picture of building footprints in Alaska from which BSLs can be extracted. On top of this, CostQuest and the Commission are investigating additional data sources, such as data from the U.S. Postal Service and electric power meters, to help identify BSLs in Alaska for future iterations of the Fabric. All of this data will substantially improve the next iteration of the Fabric, which will be made available in December prior to the next BDC

filing window. I have asked my staff to keep your offices apprised as these Alaska-specific improvements are incorporated into our process.

I also want you to know that I have personally reached out to state broadband leaders in all of the states and U.S. territories to encourage them to start now by executing a license agreement with CostQuest for access to the Fabric data and to develop a strategy for reviewing and validating the Fabric data for the geographic areas that may be subject to a challenge. At my request, FCC staff is working directly with Alaska state broadband officials to help move that process forward in Alaska because we believe that it will yield important additional data on which to assure that the Fabric is as complete as we can possibly make it based on all available data. Additionally, once the first version of the maps are made public, we will begin our availability challenge process to further refine the maps. I assure you that the Commission will pursue timely resolution of these efforts and am confident that these processes will improve both the Fabric and the availability data on served and unserved broadband locations.

Your letter suggests that the Commission should also allow Alaska ISPs an opportunity to submit to CostQuest supplemental data, including carriers' Form 477 maps, to be incorporated into the current version of the Fabric for purposes of the collection that is underway. As noted above, we are already incorporating additional sources of data for the next version of the Fabric, including ISP HUBB data, and I am committed to working with the State of Alaska and others to identify other possible sources of information that will help fill the gaps that you and other Alaskans have identified in the current Fabric. However, under the process we have developed pursuant to the Broadband DATA Act, these new data sources cannot be retroactively incorporated into the June 30, 2022 availability data submitted by ISPs. This is because our system requires broadband providers to report their broadband availability based on a static version of the Fabric this made available at the start of the filing window. For example, in our filing window that opened June 30, 2022, broadband providers across the country were required to report their broadband availability using the version of the Fabric made available for that collection. Updates and improvements to the Fabric made during the filing window will be incorporated into the next version of the Fabric, which will be used in our next data collection, which will begin in December 2022. Moreover, using providers' Form 477 maps to supplement the Fabric data presents complications, as Form 477 data has historically been unreliable and substantially overstates the presence of broadband in rural areas, especially those in Alaska with large Census blocks. In fact, the recognition by Congress and the Commission that we need to adopt a more granular approach to mapping broadband availability that goes beyond the outdated Form 477 census-block approach is at the heart of the Broadband DATA Act and the BDC.

I share your concern that federal agencies base broadband funding decisions on accurate broadband availability data. Gathering more accurate data on which to support efforts to fund unserved and underserved areas is at the core of the Broadband DATA Act, the Commission's BDC, and the Bipartisan Infrastructure Law. Publishing the broadband availability maps based on June 30, 2022 ISP data is therefore a critical first step in improving the maps that result from the inaugural BDC filing period. Once the first draft of these maps are made public, the Commission will initiate the statutorily required challenge process, which will allow stakeholders, including consumers, governmental entities, broadband providers, and other third

parties, to submit information and begin filing data to help us augment and correct areas where the maps may be inaccurate. As Congress envisioned, the challenge process will serve as a critical tool for verifying providers' data and improving the accuracy of the availability maps.

While any federal agency calculating broadband grant awards will make its own determination of the particular iteration of maps on which to base its funding decisions, since the beginning of last year, the FCC has been in regular communication with other federal authorities, including National Telecommunications and Information Administration and the Department of Commerce, to provide status updates on the BDC system and the filing window. In those conversations, we explained that the maps will become more accurate as the Fabric improves, as the BDC challenge process evolves, and as we receive more and better data. To this end, Assistant Secretary Davidson recently stated that NTIA expects the maps to be ready for use in the Broadband Equity, Access, and Deployment Program allocation process in the first half of 2023, which would enable NTIA to rely on the next iteration of maps that incorporate not only Fabric challenge data submitted by the State but also the other improvements outlined above that we are already making on our end.

Given the importance of getting the best possible information from ISPs and on encouraging other stakeholders to help us refine and build on that data through the Fabric and availability challenges, outreach and technical assistance has been a top priority for the Commission. To help filers with the complicated task of collecting and filing availability data in the BDC system, the FCC has made phone calls and sent a series of e-mails to every ISP that previously filed Form 477 data to remind them of their obligation to file data by September 1, 2022, and to make them aware of the technical assistance resources that the FCC has made available. These resources include webinars and interactive workshops and an online BDC Help Center that includes FAQs, video tutorials, and a comprehensive system user guide. All of these resources and more can be found at www.fcc.gov/BroadbandData. The FCC has also been working with states, localities, Tribes, and other entities to make sure they are ready to hit the ground running to participate in the bulk Fabric challenge process in September and to challenge the maps when they become available in November. Additional technical assistance workshops focusing on the challenge processes and other components of the BDC will continue throughout the Fall.

I understand that expanding access to affordable and reliable broadband in high-cost and unserved areas of Alaska is not an easy goal to accomplish, but meeting it will have a transformative impact in unserved locations, particularly in remote, hard to reach areas of the State. We recognize the importance of developing accurate broadband maps to support that effort and will look forward to continuing to work together with you as we work towards our shared goal of improving the Commission's broadband deployment data.

Sincerely,

Jessica Rosenworcel

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