

**STATEMENT OF
COMMISSIONER MIGNON L. CLYBURN**

- Re: *Modernizing the FCC Form 477 Data Program*, WC Docket No. 11-10; *Development of Nationwide Broadband Data to Evaluate Reasonable and Timely Deployment of Advanced Services to All Americans, Improvement of Wireless Broadband Subscribership Data, and Development of Data on Interconnected Voice over Internet Protocol (VoIP) Subscribership*; WC Docket No. 07-38; *Service Quality, Customer Satisfaction, Infrastructure and Operating Data Gathering*, WC Docket No. 08-190; *Review of Wireline Competition Bureau Data Practices*, WC Docket No. 10-132.
- Re: *Review Of Wireline Competition Bureau Data Practices*, WC Docket No. 10-132; *Computer III Further Remand Proceedings: Bell Operating Company Provision of Enhanced Services; 1998 Biennial Regulatory Review – Review of Computer III and ONA Safeguards and Requirements*, CC Docket Nos. 95-20, 98-10.

Good policy must be informed by complete, accurate, and relevant information. We should be mindful, however, that the collection of data for accurate analysis occupies the resources of both industry and the Commission, and that ultimately, consumers and taxpayers are the ones who pay. Accordingly, it is appropriate for the FCC to periodically review the need for the information it requests. Where currently collected data is no longer relevant for the benefit of Congress, the Commission, or consumers, we should begin proceedings to explore the elimination of that information, as we do today, with respect to the CEI/ONA data.

Of course, to the extent that data from industry is required so that we can fulfill our statutory obligations, then it is important that we ensure that the information we obtain is sufficient for us to do so. As such, it is important to periodically assess whether the data we are collecting, relays the information we need to make good policy choices and to issue reports required by statute. With respect to the information we collect on the Form 477, which we use as our primary tool for analyzing the status of local telephone and broadband networks and services, I support the Notice's consideration of modifications to the types of data reported on the Form. As the Notice describes, our various duties to promote policies that ensure universal service, public safety, a competitive communications marketplace, and the reasonable and timely deployment of broadband networks, require that we have the data necessary to make informed decisions, and issue knowledgeable reports, just as Congress intended.

I believe it is appropriate for us to revisit the type of data we seek on the Form 477, given that both a GAO Report and the National Broadband Plan found that the data was insufficient, and limits our ability to fulfill certain of our policymaking and reporting duties. Certainly, we must balance the need for information with the burden that data collection may have on industry. The Notice recognizes this careful balance, by seeking guidance on the possible use and limitations of publicly available or third-party commercial data, to avoid such burdens on industry, including small businesses.

I am pleased that we are exploring the use of additional broadband data, such as pricing information, so that we can better assess affordable and comparable prices. As we consider explicitly supporting broadband networks and service in our USF/ICC Reform NPRM adopted today, it is important that we have the information necessary to determine whether rates in rural areas are comparable to rates in urban areas, so that we can assess whether we have met the goals of Section 254 for ensuring universal service. Furthermore, the Broadband Data Improvement Act, requires that we compare pricing for broadband service with other countries; thus, the collection of pricing information may be necessary to fulfill that obligation.

Finally, I am pleased that we are undertaking a significant effort to allow the public to access the data we collect, as well as our analysis of that information, through our website. It is important that as we are informed, we use every tool at our disposal to inform the public.

Many thanks are due to Mary Beth, Greg and the other data experts, for your work on our Data Innovation Initiative, as well as to the Wireline Competition Bureau for your work on the Form 477 and CEI/ONA Notices.