

STATEMENT OF CHAIRMAN AJIT PAI

Re: *Modernizing the FCC Form 477 Data Program*, WC Docket No. 11-10.

Sherlock Holmes once said, “It is a capital mistake to theorize before one has data.”¹ Holmes was famous for quickly drawing advanced deductions and conclusions from just a dribble of data. But inevitably, as the story went on, Holmes would find new clues and acquire new data, which would ultimately lead him to update his theories and solve the mystery. Of course, Sherlock’s success hinged on the data being accurate—a meaningful representation of reality.

With this *Further Notice*, we aim to make sure our Form 477 data is as accurate as possible. Form 477 generates one of our most important data sets at the Commission, one we rely on every day. And the interest in Form 477 seems strong. In the two congressional hearings in which I participated last month, Form 477 was mentioned by name a total of nine times. That’s a pretty well-known dataset.

Maintaining updated and accurate data about broadband deployment is critical to bridging the digital divide. It lets us target our efforts to those areas that most need it. And it allows us to measure our progress in bringing digital opportunity to all Americans.

But we’ve heard concerns about the quality of the Form 477 data we’ve been collecting. That’s why, earlier today, we instituted a special, one-time data collection for purposes of the Mobility Fund Phase II reverse auction. We wanted to make sure that for that auction, we were drawing on the correct data.

Going forward, we want to make sure that overall Form 477 is giving us the right snapshot of where connectivity is and where it isn’t. So we’re teeing up ideas for collecting more granular and standardized data.

At the same time, we want to make sure we only collect what we need. So in this *Further Notice*, we also explore whether there are parts of Form 477 for which the burdens of collection outweigh the benefits. This is just good housekeeping. Data collections that pile up for little reason other than inertia disserve the agency in its decision-making. And every dollar we make providers—whether big or small—spend filing data that we don’t need is a dollar they can’t devote to connecting Americans.

Thank you to the staff that worked on this item. From the Wireline Competition Bureau: Kirk Burgee, Ellen Burton, Joseph Calascione, James Eisner, Chelsea Fallon, Ken Lynch, Virginia Metallo, Thom Parisi, Eric Ralph, Steve Rosenberg, Shane Taylor, Rodger Woock, Suzanne Yelen, and David Zesiger; from the Wireless Telecommunications Bureau: Judith Dempsey, Ben Freeman, Catherine Matraives, Jennifer Salhus, Paroma Sanyal, Ziad Sleem, Patrick Sun, Tom Tran, Matt Warner, and Joseph Wyer; from the International Bureau: Jose Albuquerque, Denise Coca, Jerry Duvall, Chip Fleming, Francis Gutierrez, Gabrielle Kim, Kerry Murray, Jim Schlichting, Daniel Shiman, Walt Strack, Troy Tanner, Irene Wu, and Michele Wu-Bailey; from the Office of General Counsel: Bill Dever, Rick Mallen, Keith McCrickard, and Joel Rabinovitz; from the Office of Strategic Planning and Policy Analysis: Paul LaFontaine, Wayne Leighton, and Henning Schulzrinne; and from the Office of Communication Business Opportunities: Maura McGowan, Chana Wilkerson, and Sanford Williams.

In *The Adventure of the Copper Beaches*, Sherlock Holmes cried out impatiently, “Data!, Data!, Data! I can’t make bricks without clay.” Thanks to your work, the Commission will soon have better clay to use in constructing its policies.

¹ Arthur Conan Doyle, *The Adventures of Sherlock Holmes, A Scandal in Bohemia* (1892).