

**STATEMENT OF
COMMISSIONER MICHAEL O'RIELLY**

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

I support this Further Notice, which seeks to improve the Form 477 data collection. As the item notes, the Commission uses broadband deployment data collected through Form 477 to inform its policymaking. However, the data collection is often criticized for not being sufficiently accurate or reliable. Part of the challenge is that Form 477 has been used inside and outside of the Commission for distinct purposes and the data collected for one purpose might not be well suited to another.

The Commission has addressed this over time on an ad hoc basis. For example, the Commission has refined Form 477 data through challenge processes that can consume substantial staff resources but have been necessary to ensure that scarce universal service funds are targeted to truly eligible areas. Alternatively, when the data have been deemed inadequate enough for a particular purpose, as is the case with the Mobility Fund Phase II item we just voted, the Commission must conduct a separate, one-time data collection.

Therefore, as we embark on this proceeding to reform the Form 477 data collection, it is important to step back and think about our goals for this collection. Specifically, we need to be able to articulate how we expect the data to be used so that any revised collection is calibrated to meet the intended purposes. Without this examination, the Commission could unwittingly continue to over-collect some data and under-collect other data. I found the discussion to be somewhat lacking in the circulated version, so I am pleased that it has been revised to elicit a more fulsome record.

Finally, I want to make the point that more data doesn't necessarily mean better data. If there are parts of the collection that the Commission and outside parties no longer use, then we should discontinue them. Likewise, before imposing new requirements or more granular reporting, we should carefully consider the costs and benefits. Additionally, if we can meet our data needs and policy obligations through less frequent reporting, particularly from already overburdened small providers, then we should provide any necessary relief.

I will vote to approve.