

**STATEMENT OF
COMMISSIONER JESSICA ROSENWORCEL
APPROVING IN PART, DISSENTING IN PART**

Re: *Connect America Fund*, WC Docket No. 10-90; *Universal Service Reform – Mobility Fund*, WT Docket No. 10-208

Let's face it: the Federal Communications Commission's wireless maps are not what they should be. They have too many inaccuracies to be reliable. They overstate signal strength in rural America and understate where universal service support is needed to ensure that communities are not left behind. And if we're not careful, this agency will distribute as much as \$4.53 billion over the next decade based on this less than credible set of data.

Yikes.

The good news is that the agency has a process to fix these maps. The bad news is that it's complicated.

To challenge the data in our wireless maps, mobile providers, local, state, and Tribal government officials, and other interested parties that seek a waiver from the FCC will need to create an account at the Universal Service Administrative Company. They will need to download more than 50 pages of instructions. They will need to secure a variety of carrier-specific handsets and data plans. Next, they will have to test and record the speed, signal strength, and latency every .8 kilometers in the challenged area. At each geographic interval, they also will have to record the service provider's identity, the make and model of the device used (which must be from that provider's list of pre-approved handsets), and the international mobile equipment identity of the tested device. In addition, the challenger's records will need to include information about the hardware- or software-based methodology used for testing and the associated server. All tests need to take place between 6:00 a.m. and midnight. Furthermore, challengers will need to submit all this data with sufficient density to reflect actual consumer experience.

After their data is collected, it will need to be entered into the USAC portal, validated by the system, and laid on a grid. Then a qualified engineer or government official must certify under penalty of perjury that the challenged data is correct. At that point, the new data can still be opposed by the challenged party, kicking off an adjudication.

This process is cumbersome, to say the least. I believe it is worth providing those up to the challenge with additional time to undertake these tasks. This is why I support, in part, today's decision. But it's also worth asking what the FCC should do on its own to secure the accuracy of its maps. Placing so much of this burden on those who seek to challenge our existing data is both unwieldy and unfair.

This is not how good government should operate. Instead of sitting back and expecting the public to fix what we got wrong, we should be addressing concerns head-on.

To this end, here are three things the FCC can do right now. First, the FCC has already committed to having USAC test and validate winning bidders' network coverage and performance metrics after they've built out using their Mobility Fund support. Why not give USAC a role in validating data before the auction, even by sampling? This kind of review, like audits, can be an essential tool to ensure program effectiveness.

Second, the FCC should mobilize other resources at its disposal. That includes field offices in Atlanta; Boston; Chicago; Columbia, Maryland; Dallas; Denver; Honolulu; Los Angeles; Miami; New

Orleans; New York; Portland, Oregon; and San Francisco. There's no reason why this agency should not use the spectrum expertise and tools it already has deployed.

Finally, let's use the wisdom of crowds to fix what is wrong. More than 200,000 volunteers have downloaded the FCC's Speed Test app to collect anonymized wireless broadband performance data. We need to find a way to put this information to use. Excluding crowdsourcing from our innovation toolkit means forgoing the opportunity for better maps.

In short, I believe we can—and should—do more to ensure every community in rural America has a fair shot at wireless service. That is why I am unable to offer my full support for this decision today. Accordingly, I approve in part, and dissent in part.