

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

Re: *Establishing the Digital Opportunity Data Collection*, WC Docket No. 19-195;  
*Modernizing the FCC Form 477 Data Program*, WC Docket No. 11-10.

In the second century, the Greek scholar Claudius Ptolemy plotted the coordinates of thousands of locations across Europe, Asia, and Africa. His effort married mathematics to mapmaking and helped develop the lines we know today as latitude and longitude. But the truth is he was just really interested in astrology, which required knowing with precision the exact location of someone's birthplace. As one academic suggested, while Ptolemy invented geography, it was actually inspired by a desire for better horoscopes.

In the sixteenth century, European cartographer Gerardus Mercator made the first attempt to mimic the curvature of the Earth on a flat piece of paper. This was a real innovation and it changed nautical navigation. But unfortunately for Mercator, his travels to gather information for his radically new maps aroused suspicions. He became a target and was imprisoned for heresy.

This history of mapmaking is like the maps themselves—fascinating and not without flaws. Maps can change the world and challenge what we think we know. But every map is rooted in the limitations of its time.

A little over a decade ago, in the American Recovery and Reinvestment Act, the National Telecommunications and Information Administration was tasked with coming up with the first-ever National Broadband Map depicting the state of broadband across the country. Under the law, this map was designed to be interactive and searchable and “posted on a World Wide Web site.” The Federal Communications Commission would later assume responsibility for this map from NTIA.

Let's face it, the National Broadband Map is rooted in its time. It's showing its age. It needs an update. That's because this map simply doesn't provide an accurate picture of where service is and is not across the country. We need to do better. Because everyone needs access to modern communications to have a fair shot at 21<sup>st</sup> century success.

We know too many Americans lack access to broadband. According to the agency's most recent report, more than 21 million Americans have no access to high-speed internet service. But there is reason to think that the digital divide is a whole lot wider than our official statistics suggest. One study has found that 162 million people across the country do not use internet service at broadband speeds. That turns our digital divide into a yawning chasm.

We have to figure out what is going on. I'm not the only one who feels that way. Members of Congress across the political spectrum have criticized our maps. One cabinet official even called the FCC's maps “fake news.” While that is a loaded term, I think it's obvious to everyone we need to do better. Our wired maps have serious inaccuracies. Our wireless maps are so suspect they are the subject of an ongoing investigation.

So today's effort to improve the data collection that informs our nation's broadband maps comes not a moment too soon. Bring it. We need to fix this mess.

The flaws in our existing data collection are all too clear. Right now, FCC data overstate service because if only one house or business in a census block has service, we deem the entire census block served. On top of that, there is no check built into the system for citizens to tell the agency that our data and maps are incorrect. That's why I came up with a hack for them to do it. I set up the e-mail box [broadbandfail@fcc.gov](mailto:broadbandfail@fcc.gov) and encouraged consumers to write to this agency describing their difficulties securing service and the errors in our maps and data. And they did.

Which brings me to today's order and rulemaking. It rightfully starts with the recognition that we can and should do better when it comes to knowing where broadband service is and is not.

But unfortunately, big details go unaddressed. For starters, it doesn't answer the question of what will happen to the National Broadband Map. Maps are a vital tool for the public to understand the state of service across the country. Why won't we commit to updating this map at the FCC? I fear that the result of this effort is going to be killing off the National Broadband Map and substituting it with an impossible to find web page maintained by the Universal Service Administrative Company—and if that's what happens, this agency will have failed.

Moreover, the decision to hand off this mammoth undertaking to the administrator of universal service funds does not make sense. What is the logic behind saddling USAC with these tasks? It has never done a data collection of this magnitude. How will they be accountable to the public? Plus, all of their work is paid for by the universal service fund. Right now there is bipartisan legislation with support from our authorizing committee in the United States Senate that specifically charges the FCC with this data collection and disallows the universal service fund for paying for this effort. It will be an embarrassment if a few months hence we will have to rip this up and start all over.

In addition, if we want a truly accurate picture of broadband service across the country we are setting ourselves up for problems by not even asking how price and affordability plays a role. Here's the thing: it plays a big one.

These flaws are real and they lead me to dissent in part. But the gist that we need better data animates our efforts today—and I applaud that. Furthermore, the rulemaking takes up some ideas I've put forward, including the use of crowdsourcing, data from postal trucks, and information from applications, like the FCC's own speed test app.

So this effort is a start, but we have a long way to go before the FCC has an honest accounting of where broadband is and is not all across the country. We have a long way to go before the public can trust our broadband data is accurate. We have a long way to go before we build the maps we need—maps that are fully rooted in the digital age.