

**STATEMENT OF  
COMMISSIONER GEOFFREY STARKS,  
DISSENTING**

Re: *Inquiry Concerning Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion*, GN Docket No. 20-269.

Six weeks into the COVID-19 pandemic, the Commission released its 2020 Broadband Deployment Report. Even in those early weeks, it was already clear that this pandemic would bring our failure to close the digital divide into the sharp relief. Releasing a report that confidently touted the timely deployment of broadband—just as more than 15 million students found themselves without the broadband connections and devices required to participate in distance learning—demonstrated how far this annual undertaking has departed from reality. In gathering information for next year’s report, the Commission should have taken a different approach.

Instead, the Commission continues to repeat its mistakes. As I noted in my dissent from last year’s Notice of Inquiry, I fundamentally disagree with the approach of comparing broadband providers’ deployment in one year against their deployments in prior years to measure “progress.” I continue to believe this approach gives us little understanding of internet inequality and the ways to combat it.

We also continue to rely on the Commission’s misleading Form 477 data. I am disappointed that, despite broad recognition that Form 477 has distorted our view of the digital divide, the Commission did not develop alternatives in time for this year’s Notice of Inquiry. As we approach the Broadband DATA Act’s September 21, 2020 deadline for new mapping and data rules, the entire Commission should commit to making this the last time we rely on this flawed data set.

Because the proposals in this Notice of Inquiry are likely to produce yet another report that misrepresents internet inequality in the United States, I respectfully dissent.