

**STATEMENT OF
COMMISSIONER GEOFFREY STARKS
CONCURRING**

Re: *In the Matter of Barrier Communications Corporation d/b/a BarrierFree*, EB-IHD-19-00029003

I support today's decision to impose the statutory maximum, but that limitation means that the forfeiture proposed here cannot be, in my opinion, severe enough to adequately address the harm BarrierFree caused and deter future violations. Correcting the problems BarrierFree caused took resources away from other Commission priorities, and, as I explained in [my dissent](#) from the 2019 *Broadband Deployment Report*, BarrierFree's massive overstatement of its deployment led to inaccurate public statements from the Chairman's office.¹

Going forward, the Commission's experience with BarrierFree should reinforce the need for robust verification and challenge processes. If our existing processes worked, the Commission would have identified BarrierFree's errors much sooner. The company's submission contained numerous anomalies that should have raised red flags. To name just one: in its first broadband service report to the FCC, BarrierFree stated that, as of December 2017, it provided high-speed broadband service in an area where 62 million people live. If Barrier Free's reporting was correct (and it was not), that would have meant the company went from providing no service to being the fourth largest ISP in the United States in less than a year. That should have set off alarms. As the Commission works toward the September 21, 2020 deadline required by the Broadband DATA Act for new mapping rules, I will continue to advocate for rigorous verification and challenge to catch these errors before incorrect data is released and restore public confidence in our broadband deployment data.

¹ Statement of Commissioner Geoffrey Starks, *Inquiry Concerning Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion*, GN Docket No. 18-238, 2019 Broadband Deployment Report, FCC 19-44 (rel. May 29, 2019).