

**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 19-285, 2020 Broadband Deployment Report.

The FCC's limited progress on new broadband maps has left the Commission without high-quality, nationwide data on the deployment of Advanced Telecommunications Capability. It is a shame that we are once again relying on Form 477 data, with all its inaccuracies. At this point, Form 477's problems are well documented, acknowledged throughout the telecommunications industry, and recognized by bipartisan majorities in both houses of Congress. And they are recounted in the 2018 and 2019 iterations of this report. We are all well versed in Form 477's flaws.

The fact that this report must rely on the unreliable should be reflected in its conclusions. I cannot approve the report's confident declaration that this data constitutes "compelling evidence" that Advanced Telecommunications Capability is being deployed on a reasonable and timely basis. We do not have a strong basis for that conclusion, and we should say so. I therefore respectfully dissent.

This report, which I have called the "State of the Union" for the digital divide, calls closing the digital divide "the Commission's top priority." I wholeheartedly agree with that aspiration, which has not always been evident in the Commission's actions. Earlier this year, the Commission committed more than \$16 billion to bringing broadband to our hardest to reach areas through the Rural Digital Opportunity Fund. But we know that the digital divide is not just a rural issue. Census Bureau surveys show that three times as many households in urban areas remain unconnected as in rural areas.<sup>1</sup> When it comes to making sure all Americans can access affordable, high-quality broadband, we have a long way to go.

In light of the struggles many Americans have faced over the last six weeks, it is especially perplexing and disturbing that the majority would cast this report as a victory lap. When public health requires social distancing and even quarantine, closing the digital divide becomes central to our safety and economic security. But too many Americans cannot access online work, medical help, and distance learning because broadband is too expensive or not available. As we enact emergency efforts to respond to the COVID-19 crisis, I will continue to call on the Commission to speed the work of correcting our broadband deployment data and to develop better data and policy on affordability—critical steps toward a lasting solution to the digital divide.

I thank the many staff members from across the Commission who contributed to the creation of this report.

---

<sup>1</sup> See Blair Levin and Larry Downes, *Cities, not rural areas, are the real Internet deserts*, N.Y. Times (Sept. 13, 2019), <https://www.washingtonpost.com/technology/2019/09/13/cities-not-rural-areas-are-real-internet-deserts/>.