

August 2017 FCC Meeting Recap: FCC Proposes Changes to Broadband Data Collection

August 17, 2017

At its August Open Meeting, the Federal Communications Commission ("FCC" or "Commission") voted unanimously in favor of a [Further Notice of Proposed Rulemaking](#) ("FNPRM") that explores ways to improve the value of data, collected on FCC Form 477, regarding the availability of mobile and fixed broadband and other communications services, and to identify and eliminate unnecessary or overly-burdensome filing requirements. The FNPRM proposes numerous changes to data collection for mobile and fixed services as well as ancillary logistical issues related to the Form 477. Comments on the proposals set forth in the FNPRM will be due 30 days after the item is published in the Federal Register, and reply comments will be due 15 days after initial comments. The FNPRM has not yet been published so the exact comment deadlines are not known at this time.

Mobile Services. With respect to mobile broadband services, the FNPRM notes that the Form 477 data collection "is intended to represent where consumers should expect to receive mobile broadband services at the minimum speeds set by the providers in their marketplace, and it was designed to minimize burdens and allow flexibility for providers." However, according to the FNPRM, the current process has limited "the ability of policymakers and consumers to compare offerings among service providers" because reporting entities use different methodologies to gather and report their data, and the submissions historically have been deemed confidential. To alleviate these concerns and facilitate a meaningful comparison of the data submitted by numerous providers of mobile broadband service, the FNPRM seeks comment on the following proposals:

- Making service providers' minimum advertised or expected speeds publicly available;
- Changing the file format in which the data must be submitted (providers would be required to submit their mobile deployment files as rasters rather than, or in addition to, shapefiles);
- Requiring the submission of "standardized propagation models for 4G LTE and later-generational technologies," and the input parameters for such models; and
- Requiring providers to submit "on-the-ground data" which represents actual consumer experiences.

The Commission further seeks comment on potentially adopting different reporting requirements for 5G wireless technologies and satellite broadband service. Additionally, the FNPRM proposes to eliminate the following requirements: (1) submission of mobile broadband deployment data by spectrum band, (2) reporting coverage information for nine types of technology in a provider's network (this would be replaced with coverage maps for 3G, 4G non-LTE, 4G LTE, and 5G technologies), and (3) submission of mobile broadband service availability data by census tract. The FNPRM also seeks comment on proposals to improve the data collected for mobile voice deployment and mobile broadband and voice subscriptions.

Fixed Services. For fixed services, the FNPRM seeks comment on whether to “eliminate the separate reporting of available contractual or guaranteed data throughput rates for business/enterprise/government services” because such data “does not appear to provide additional useful insight,” is burdensome for filers, and is often reported incorrectly. However, the Commission proposes to maintain existing data collection requirements for consumer/residential/mass market services.

The FNPRM also seeks comment on the costs to filers, and feasibility of, a proposal to improve broadband “availability” data by requiring filers “to identify on Form 477 three categories of service areas for each technology code: (1) areas where there are both existing customers served by a particular last-mile technology, and total number of customers using that technology can, and would, be readily increased within a standard interval upon request; (2) areas where existing customers are served but no net-additional customers using that technology will be accommodated; and (3) areas where there are no existing customers for a particular technology but new customers will be added within a standard interval upon request.”

Additionally, the FNPRM proposes to require providers to report broadband deployment data at a more granular level than census blocks (e.g., geospatial data, address-level, street segments, etc.). The Commission also asks whether fixed broadband providers currently are able to assess “whether any locations within each block are beyond the reach of their facilities, such that they could not make service available within a typical service interval,” and if not, how burdensome it would be to make such a determination. The FNPRM further seeks comment on improving fixed broadband deployment reports from satellite broadband providers.

In addition, the FNPRM proposes a new methodology for rate-of-return carriers to submit their fixed voice subscription counts following adoption of new rules in the Connect America Fund proceeding. Under this methodology, fixed voice subscription data reported on Form 477 by rate-of-return carriers that switch to the Alternative Connect America Cost Model and Alaska Plan would be analyzed in conjunction with Study Area Boundary data “to develop and publish aggregated voice line counts for every study area.”

Other Issues. Finally, the FNPRM seeks comment on a number of other proposals, including (1) making public minimum advertised or expected speed data for mobile broadband services, national-level fixed broadband subscriber counts and disaggregated subscriber data; and (2) shifting from a semi-annual collection of data to an annual collection.