Connect America Fund Update: FCC to Establish Process for Challenging National Broadband Map Data
A Connected Nation Policy Brief
December 3, 2012

The Federal Communications Commission (FCC) on November 19, 2012 released a new Notice of Proposed Rulemaking to further direct $185 million in Connect America Fund subsidies to areas of the country that do not have adequate access to fixed broadband service. This proposal is a further step in the FCC's reform of the Universal Service Fund (USF) that will target subsidies to support high-speed broadband, as well as voice service networks, across remote areas of the country (See USF/ICC Transition Order). As part of this transition, the FCC will shortly be releasing a set of data from the National Broadband Map that indicates areas that will be eligible for Phase I Connect America Fund subsidies and will be asking the public to comment on the accuracy of that data.

Phase I of the Connect America Fund is targeted at the areas of the country that are in the service territories of larger incumbent local exchange carriers (LECs) that do not have fixed broadband today. Earlier this year, $300 million was allocated to fund broadband build-out in these areas at $775 per customer location (See Connected Nation Policy Brief FCC Begins Implementation of Connect America Fund: Price Cap and Rate of Return Carriers). Providers such as Frontier and CenturyLink collectively accepted $115 million of that funding. (See Connected Nation Policy Brief Connect America Fund Underway: Some Telephone Providers Commit to Broadband Deployment: A Connected Nation Policy Brief.)

Last week, the FCC proposed to allocate the remaining $185 million of Phase I subsidies to this same group of incumbent LEC providers. One of the FCC's proposals is to target these subsidies at areas of the United States that do not have access to fixed terrestrial broadband service at speeds of 3 Mbps download/768 kbps upload, as reported on the National Broadband Map.

To support this effort, we expect that on or around **December 5, 2012,** the FCC will release a list of all census blocks areas that will be eligible for these targeted subsidies. This list will be based on data collected by Connected Nation and other NTIA State Broadband Initiative (SBI) grantees that are now shown on the National Broadband Map. The FCC will ask for public comment as to the accuracy of these data and have requested that commenters work with state mapping agents like Connected Nation.

REALLOCATION OF CONNECT AMERICA FUND PHASE I SUBSIDIES
The FCC has made two proposals to allocate the remaining $185 million in Phase I subsidies. The first proposal would allocate the sum among larger incumbent LECs to build out broadband in areas within their service territory that do not have access to terrestrial fixed broadband at 3 Mbps download/768 kbps upload today. The alternative proposal is to roll this sum into Phase II of the Connect America Fund for these same providers, a process that the FCC has already begun. (See Connected Nation Policy Brief FCC Begins Assessment of Connect America Fund Phase II Cost Model: A Connected Nation Policy Brief.)

The FCC proposal to direct these subsidies to areas without access to fixed broadband service at **3 Mbps download/768 kbps upload** is a significant change from the FCC's first attempt at Phase I earlier this year. In that first iteration, areas eligible for the program were those that the National Broadband Map

noted as having access to fixed broadband at a lower speed threshold, 768 kbps download and 200 kbps upload. Many providers, including CenturyLink, questioned the accuracy of the FCC's list of eligible areas for that first attempt at Phase I and this low speed threshold.

For this second round of Phase I, the FCC proposes a systematic approach to identifying the areas eligible for funding and will give the public the opportunity to confirm or correct that list, based upon engineering studies and direct engagement with state mapping agents like Connected Nation.

The process of identifying areas eligible for Connect America Fund Phase I subsidies will begin on or around December 5, 2012, when the FCC releases a comprehensive list of census blocks that do not have access to terrestrial, fixed broadband at 3 Mbps download/768 kbps upload, based on the National Broadband Map. Concurrent with that release, the FCC will ask the public to comment on the accuracy of that list, specifically inquiring whether the National Broadband Map overstates or understates fixed broadband availability. In particular, the FCC will "solicit public input on updates, revisions, and other potential corrections to the National Broadband Map data" and requests that all parties questioning the accuracy of the Map should note on the "steps parties have taken to bring the alleged errors to the attention of the relevant state mapping entity" and "the outcome of any of those discussions." The FCC notes that it will give weight to evidence supported by field tests and engineering certifications, and it requests that any party wishing to challenge the mapping data in an area should serve a copy of that challenge with the providers serving that area. Once this process is complete, the FCC will publish a final dataset of census blocks eligible for Phase I Connect America Fund subsidies.

The FCC's data validation process is based largely on suggestions that Connected Nation proposed in its comments and filings in the FCC's *Universal Service Fund Transformation* docket. (See http://www.connectednation.org/sites/default/files/10_30_12_ex_parte_cn_response.pdf) Connected Nation strongly believes that sound policy decisions require sound data, and as a broadband mapping agent in the SBI program, Connected Nation takes its responsibility seriously and prides itself on the accuracy and comprehensiveness of its broadband data collection and validation efforts.

Connected Nation constantly strives to make its maps as accurate as possible, not only by double-checking data received from providers but also by independently validating and verifying coverage through a number of processes, including on-site field validation and engineering assessments in many locations. Connected Nation's provider participation rate is over 95%. Connected Nation also has constantly asked the public to help improve the maps' quality, and since program inception it has received and resolved over 17,000 inquiries from the industry and the public regarding the accuracy of its state maps.

Connected Nation believes that all parties will benefit from a challenge process that quickly engages state mapping agents who can then investigate the claims, perform further data validation tests where appropriate, and issue corrections based on the field tests and engineering certifications that the FCC is expecting to support any change. Connected Nation will proactively analyze the data released by the FCC on December 5 and will work collaboratively with all members of the industry and the public to assess and provide any feedback needed. This work will proceed alongside Connected Nation's regular broadband provider data collection process that is leading to the submission of updated broadband availability information to the NTIA in April 2013.

For more information, please contact your Connected Nation mapping contact, or e-mail Connected Nation directly at policy@connectednation.org.