



September 9, 2019

The Honorable Michael F. Doyle
Chairman
House Energy & Commerce Subcommittee on Communications & Technology
Washington, D.C., 20515

The Honorable Robert E. Latta
Ranking Member
House Energy & Commerce Subcommittee on Communications & Technology
Washington, D.C., 20515

Dear Chairman Doyle and Ranking Member Latta:

In advance of the House Energy and Commerce Subcommittee on Communications and Technology hearing on “Legislating to Connect America: Improving the Nation's Broadband Maps,” our organizations, which have a shared commitment to ensuring rural Americans have access to high-speed broadband connectivity, write to offer our thoughts on improving the nation’s broadband maps on behalf of the rural broadband consumers our members serve.

More granular and accurate maps showing broadband availability are a key part of reaching all rural Americans with high-speed broadband service. This will enable us to clarify existing gaps in coverage and harmonize the diverse solutions that will be required to help rural Americans keep pace with their urban counterparts.

To that end our organizations believe several steps are critical to improving the nation’s broadband maps:

- More granular data is needed to allow the maps to reflect actual coverage rather than classifying entire census blocks—which are often geographically large in rural areas—as served or unserved.
- Inclusion of broadband service performance characteristics such as latency and monthly usage limits would provide important insight to the quality of service broadband consumers experience.
- Data accuracy including standardization of data is critical to ensure all providers must adhere to specific guidelines when reporting what areas they can serve.
- Further data accuracy components should include crowdsourcing and, perhaps most importantly, an easily accessible challenge process to flag issues and further verify the accuracy of maps.

Fortunately, the FCC has recently taken steps on some of these items and we believe that Congress has a role to play in providing further guidance.

We are pleased various House legislative proposals including the Broadband Deployment Accuracy and Technological Availability (DATA) Act (H.R. 4229) introduced by Reps. Loeb sack and Latta and the Mapping Accuracy Promotes Services (MAPS) Act (H.R. 4227) introduced by Reps. McEachin and Long as well as the Broadband Data Improvement Act (H.R. 3162) introduced by Reps. McMorris Rodgers and O'Halleran incorporate many of the important aspects we outlined.

Improving broadband maps is an incremental process that will not happen overnight. Utilizing the proposals we have suggested, we are encouraged to see federal agencies and Congress moving forward simultaneously with mapping improvement and deployment activities to judiciously reach rural consumers with connectivity required to fully participate in our 21st Century economy and society.

We look forward to continuing to work with committee members and bill sponsors as engaged stakeholders on these matters and thank you for continuing this important discussion in the halls of Congress.

Sincerely,



Jim Matheson
Chief Executive Officer
National Rural Electric Cooperative Association



Shirley Bloomfield
Chief Executive Officer
NTCA-The Rural Broadband Association

cc: Members of the House Energy and Commerce Subcommittee on Communications and Technology