

United States Senate

WASHINGTON, DC 20510

February 14, 2019

The Honorable Ajit Pai
Chairman
Federal Communication Commission
445 12th Street, SW
Washington, DC 20554

Dear Chairman Pai:

After a preliminary review of speed test data submitted through the Mobility Fund II (MF-II) Challenge Process (Challenge Process), you announced an investigation into potentially significant violations of the Federal Communications Commission's (FCC) mapping rules and the submission of incorrect coverage maps. While we agree that a thorough and expeditious review of these mobile broadband coverage maps is a step in the right direction, it will not solve the broader mapping problems that the Challenge Process has brought to light. In order to get an accurate snapshot of the actual broadband services – mobile and fixed – available to people on the ground, we need to have more, not fewer, data points, and a dynamic, ongoing process that allows individual consumers and outside stakeholders to validate data that broadband providers submit.

The Challenge Process for MF-II was aptly named because collecting and submitting information for the FCC maps was, indeed, a challenge. As you know, by the end of the eight-month challenge window, of the 106 entities who signed up to participate, less than twenty percent submitted and certified valid challenges. The fact that so few participants were able to submit challenges during this process is staggering and shows that the FCC needs to reevaluate their approach to make the coverage data validation process more user-friendly and encourage public participation.

While the MF-II Challenge Process did have its flaws, we should look to it as the beginning of a new, collaborative mapping process that encourages people to participate, rather than the end of an imperfect experiment. While the impediments to participation were simply too difficult and expensive for many state and local officials to overcome, we should not lose sight of the fact that they want to be a part of this process and the FCC should capitalize on this.

The parent whose child cannot complete their homework at night because they do not have the ability to connect to the internet can certainly tell you they don't have coverage. So can the doctor struggling to access electronic medical records at a rural hospital. That is why we believe crowdsourced data has the ability to play an invaluable role in improving broadband coverage maps and the creation of a continuous public feedback mechanism deserves further investigation by the Commission.

One way the FCC may be able to do this is by allowing the use of data from consumer initiated speed tests, including commercial data sets that take advantage of such data, to help supplement Form 477 data. Further, the FCC could look to incorporate the data from states like many of ours who have begun to take mapping into their own hands using voluntary public speed tests, drive tests and GIS software to create their own maps on a more localized and granular level.



While we are glad the FCC is trying to address some of the issues with their mapping though the ongoing Form 477 proceeding, this alone will not solve everything. As long as we continue to rely solely on carrier-reported Form 477 data, we will never have a complete picture that accurately depicts the real world experiences of Americans. That is the lesson we should learn from the Challenge Process.

We are not suggesting that crowdsourced data is perfect and that it alone will be enough to fix the greater challenges with broadband mapping, but it is an important tool we should have in the toolbox. We believe the creation of a public feedback mechanism is feasible and would be a critical first step toward creating more reliable and accurate broadband maps. Therefore, we respectfully ask for a formal and prompt response to the following questions and would welcome the opportunity to meet with you or your staff to discuss them further:

- Do you see validity in using a continuous public feedback mechanism to help improve broadband coverage maps and data?
- Do you think it is feasible for the FCC to implement a public feedback mechanism to help validate Form 477 data?
 - If so, what would that process look like?
 - If not, what specifically can the FCC use to help supplement Form 477 data in determining where there is broadband coverage in the United States?

We look forward to your response and continuing our work together to close the digital divide.

Sincerely,

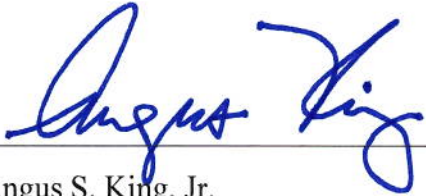

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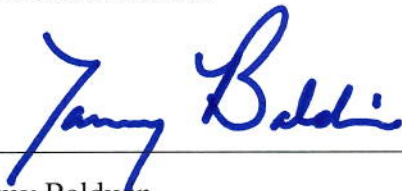
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