August 9, 2022

By Electronic Filing   Notice of Ex Parte filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, NE Washington, DC 20554

Re: Broadband Map; Broadband Data Collection (WC Docket Nos. 11-10 and 19-195)

Dear Ms. Dortch:

This is to place in the above-captioned Broadband Map and Data Collection proceedings, recommendations from the National Spectrum Management Association (NSMA)[1] regarding suggested methods for optimizing the National Broadband Map. In general, it is suggested that the FCC consider incorporating (or letting spectrum coordinators and licensees incorporate) Universal Licensing System (ULS) data into the national broadband map.

On July 8, 2021, then Acting FCC Chairwoman Jessica Rosenworcel described in detail new Federal Communications Commission (FCC) efforts to improve the existing data and mapping systems. In particular efforts were launched to enhance Broadband Data Collection (BDC) processes and to provide consumers with the ability to provide information about the data speeds and broadband access they were experiencing.[2]

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[1] The NSMA, established in 1984, is a voluntary association of individuals involved in the spectrum management profession including service providers, manufacturers, frequency coordinators, engineers and consultants. NSMA's goal is to promote rational spectrum policy through consensus views formulated by representatives of diverse segments of the wireless industry. NSMA provides a linkage between government regulations and industry practice by developing recommendations (https://nsma.org/recommendations/) that streamline and standardize procedures used by the frequency coordination community.

[2] July 8, 2021 Letter from FCC Chairwoman Rosenworcel to Cong. Good states in part: "In my first meeting as Acting Chairwoman, I announced the formation of the Broadband Data Task Force to coordinate and expedite the design and construction of new systems for collecting and verifying broadband deployment data. The Task Force is leading a cross-agency effort to implement the requirements of the Broadband DATA Act and kick-start our work to more accurately measure and reflect our nation's broadband needs. Page 2—The Honorable Bob Good Following the creation of the Task Force, we have taken several important steps. For example, we have retained an expert data architect and design firm to work with the Commission's own data and IT systems specialists to assess our existing data and mapping systems. The vendor and Commission staff have already developed an initial data flow structure for the new Broadband Data Collection (BDC) systems and processes, which include processes to collect challenge and crowdsourced data. In addition, we have conducted a Request for Information (RFI) process to jump-start our contracting for the creation of the Broadband Serviceable Location Fabric, a common dataset of all locations in the United States where fixed broadband internet access service can be installed. We received

On June 23, 2022, the FCC issues a Public Notice titled "BROADBAND DATA TASK FORCE ANNOUNCES ACCESS TO THE BROADBAND DATA COLLECTION SYSTEM FOR PURPOSES OF REGISTERING FILER INFORMATION" (WC Docket Nos. 11-10 and 19-195).

"By this Public Notice, the Broadband Data Task Force (Task Force) announces that fixed and mobile broadband providers and other filers of broadband availability data in the Broadband Data Collection (BDC) may obtain early access to certain portions of the BDC system to enter identifying entity information in advance of the opening of the broadband availability data filing window on June 30, 2022."

In other words, the FCC is providing a system by which BDC filers can upload data about their offerings.
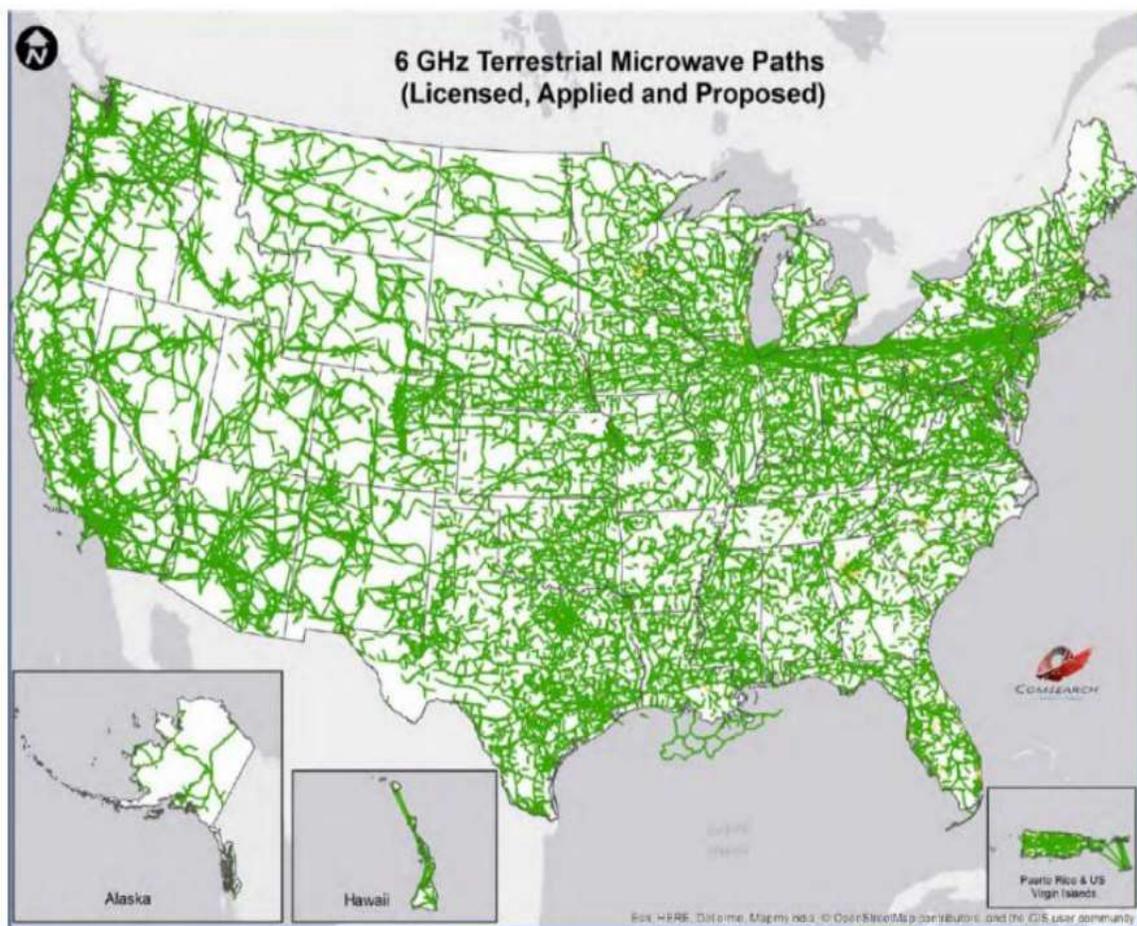
NSMA suggests that some national scale broadband deployment maps can be readily generated to supplement the information being provided by the BDC filers. NSMA notes that the following available information in the FCC's possession in the Universal Licensing System (ULS) database may be useful in enhancing the broadband map. This useful and specific data includes and is not limited to:

1. Coordination Data: The location, bandwidth capacity, spectrum band, call sign and radio station authorization licensee contact information for fixed wireless links deployed utilizing point-to-point microwave and point-to-multipoint microwave systems.
2. Possible Fiber Interconnection Points: Many of these systems interconnect with fiber access points (FAPs) and are often specifically designed to provide high capacity, low latency backhaul and last mile connectivity back to the internet.
3. Sample Map: A sample 6GHz deployment map illustrating one aspect of how this data could be visualized is provided here: Details on such a map can be magnified to specific latitude/longitude coordinates.

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responses to the RFI, held industry feedback sessions with multiple entities, and quickly moved forward with a June 1 Request for Proposal, consistent with recommended government solicitation practices, based on those feedback sessions. We received proposals in response to the RFP on July 1 and are reviewing expeditiously. We are also working with a number of broadband providers to obtain real-world data based on the new BDC coverage parameters to help expedite our development of the BDC IT systems and data structures that will support the new collection and to inform our effort to develop training and other outreach to providers in advance of their BDC filings. At the same time, we have increased consumer outreach efforts regarding broadband data gathering. To this end, we have developed and publicized a new web-based portal (https://www.fcc.gov/BroadbandData) for consumers to share their broadband experiences and information about their efforts to secure service. We also have encouraged use of the FCC's speed test app, which in addition to providing consumers with information about their mobile broadband service, increases the amount of crowdsourced data that the Commission receives to assess the state of deployment nationwide."

[Sample map of broadband systems deployed nationally]

Map 1 – 6GHz Networks Nationwide

6 GHz Terrestrial Microwave Paths
(Licensed, Applied and Proposed)

Alaska

Hawaii

Puerto Rico & US Virgin Islands

Source: Comsearch as cited by AT&T, March 16, 2018, ET Docket 18-295 & GN Docket 17-183.

CONCLUSION & RECOMMENDATION:

Maps outlining existing, licensed and proposed fixed wireless deployments provide highly detailed information about planned and deployed systems that are broadband capable for backhaul and last mile. NSMA suggests harnessing this data for the nation's broadband map, including by allowing coordinators and licensees to submit it into the broadband mapping system. In general, it is suggestsed that the FCC consider incorporating (or letting spectrum coordinators and licensees incorporate)

Universal Licensing System (ULS) data into the national broadband map. It may prove especially useful as national scale broadband deployments such as the Rural Development Opportunity Fund – RDOF; Infrastructure Investments and Jobs Act (IIJA), Tribal Broadband Connectivity Program (TBCP), Broadband Infrastructure Program (BIP), Connecting Minority Communities (CMC) Pilot Program and other programs are underway.

Sincerely,

/s/

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