

From: Karl Demi
To: [mappingrfc](#)
Subject: Improving the Quality and Accuracy of Broadband Availability Data
Date: Tuesday, July 17, 2018 9:50:47 AM
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National Telecommunications and Information Administration,

I realize this is a day late but I hope you will include my comments or that someone else has pointed out these issues.

There are multiple problems with providing broadband to rural areas, the most prominent of which is no return on investment. The problems as I see them are as follows;

1. Internet service providers get little or no return on investment so they will not deploy to rural areas.
2. Internet service providers misrepresent their broadband coverages. For example; Verizon determines coverage zone boundaries, then reports each full zone covered even though only one address in each zone has service.
3. Politicians will not pursue rural broadband because most voters live in populated areas with adequate Internet service. There is too little or no ROI with votes for politicians in rural areas.
4. Not having broadband Internet access to rural areas greatly inhibits the United States ability to compete with other countries worldwide.
5. Children from our rural areas have their education suffer due to lack of broadband Internet jeopardizing the future of the United States.
6. Using your definition of broadband, I'm guessing that 60% or more of Lycoming County PA land mass is not covered.

Here are couple potential solutions the you can facilitate;

1. Drastically reduce the cost of getting broadband to rural areas by requiring installation of shared underground microfiber conduit along all roads. Any company would be allowed to utilize this conduit to provide broadband services to rural areas.
 - a. This can be incorporated with regular maintenance road work such as a resurfacing so there is not significant additional expense.
 - b. Implementation of this conduit could be limited to roads that are relevant to providing broadband to rural areas.
2. To get accurate measurement of real broadband Internet coverage will require a survey of every address in the USA. This can be accomplished cost effectively by enlisting Colleges to perform the survey and collate the results for their respective areas.
 - a. Asking the occupants of each address is your most reliable source of broadband information.

- b. Service providers are not forthcoming with their actual coverage areas and unless they are required by law to reveal their infrastructure they are not likely to provide accurate verifiable data of their coverages.
3. I don't know if it is feasible but adding a broadband question to income tax forms may yield decent results.

Hope this helps,

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