



July 15th, 2018
National Telecommunications and Information Administration
U.S. Department of Commerce
Via Email

RE: NTIA REQUEST FOR COMMENTS ON IMPROVING THE QUALITY AND ACCURACY OF BROADBAND AVAILABILITY DATA

I am writing to express my concerns about the accuracy of the FCC broadband coverage maps and ways I think they can be improved.

Under current reporting requirements collected through the FCC's Form 477, the maps are based on what may be perceived as outdated and potentially biased standards that do not reflect the true nature of broadband availability in rural areas.

The data seems to be skewed, especially in rural communities such that if one home in a census block is connected, the entire census block is deemed as being connected, contrary to the "ground truth". Western Sonoma County, California, where I live, is a case in point. Our area is generally un- or underserved as you head west from Highway 101, including west and southwest Santa Rosa, the Russian River area and Sebastopol, to the coast.

I support NTIA's recommendations they have provided in their comments to the FCC in the matter of modernizing the FCC Form 477 Data Program. In addition, I also support the comments provided by the North Bay/North Coast Broadband Consortium (NBNCBC) in response to NTIA's request for comments on how to modernize the FCC Form 477 Data Program. I believe both NTIA's and NBNCBC's recommendations help the nation and the State of California take a step forward in capturing a more accurate depiction of broadband availability in rural areas.

I am sure I do not need to "sell" you on the importance of High Speed Internet for education, health, economic development and safety, especially in rural areas and increasingly for agriculture. We want/need to adopt "precision agriculture and "ag tech" for water conservation, regenerating healthy soils, government compliance, and applying for federal and state programs, but cannot for lack of connectivity.

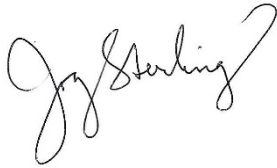
Here in Sonoma County, NBNCBC is working on a survey focusing on agriculture that will ask farmers to do on the ground speed testing. The survey data will provide an accurate assessment of the extent and

quality of broadband service, covering the lion's share of our rural areas. I believe it will further serve as a valuable template that could be scaled up to cover other agricultural regions.

I appreciate FCC Chairman Pai's pledge to expand broadband in our rural communities. An excellent first step will be improving the maps to better show the way forward.

Thank you for your time, consideration and all your good work.

Sincerely,



Joy Sterling

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