



In the Matter of

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|-----------------------------------------------------------|---|----------------------------------------------------------------------|
| Department of Commerce                                    | ) | Docket No: 180427421-8421-01                                         |
|                                                           | ) | RIN 0660-XC042                                                       |
| National Telecommunications<br>Information Administration | ) | Improving the Quality and Accuracy of<br>Broadband Availability Data |

COMMENTS OF FUNDS FOR LEARNING

On May 30, 2018 the U.S. Department of Commerce released a Public Notice requesting comment "...on actions that can be taken to improve the quality and accuracy of broadband availability data, particularly in rural areas, as part of the activities directed by Congress in the Consolidated Appropriations Act of 2018...." The FCC and NTIA have been collecting nationwide information that is collected from broadband service provider responses to the FCC Form 477 which enables the FCC to collect information about broadband connectivity and deployment throughout the United States. The FCC and Department and Commerce are concerned that there is no independent validation or verification when it comes to the submittal of the Form 477 and there are some issues with data accuracy.

Funds For Learning, LLC ("FFL") is a regulatory compliance company that services E-rate stakeholders and has been specializing exclusively in the E-Rate program since the program's inception in 1997. FFL helps keep the public informed about program developments while assisting clients with applications, other required form filing, electronic recordkeeping, and compliance with the program's many and complex rules and administrative requirements.

FFL supports the goals and objectives of the broadband mapping initiative and believes there is current federal data to augment the current data that is gathered by the FCC's Form 477. The broadband mapping project helps provide policymakers with information to positively influence public policy. The FCC's E-rate program helps defray broadband costs for our nation's K-12 public and private schools and our public libraries and there is available third-party E-rate data to inform the public of where the broadband connections exist and can be broken out by rural and suburban geographic regions.

There are approximately 21,500 schools and libraries that participated in the E-rate program in 2018 that includes nearly 130,000 specific sites. As part of the application process, schools and libraries need to identify what type of broadband connections they have contracted for, the exact speeds, who their service providers are and even how much money that they are requesting based on the service and their discount rate per the National School Lunch Program. The applications go through a strict regulatory



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review process from the Universal Service Administrative Company (USAC) where the regulators confirm the applicants went through a fair and open competitive bidding, that the school has enough money in their budget to pay the non-discounted portion and that the services are E-rate eligible. USAC even verifies this information for the second time when applicants and service providers request reimbursement after the services have been delivered.

There is available third-party broadband data of every K-12 public and private school and public library that have applied for E-rate funds since 2015. Furthermore, the E-rate data is updated each Spring and if the FCC and NTIA broadband map included this important data set, it would have current information for policymakers or the public to analyze and understand any gaps that might exist in broadband deployment and FFL encourages that K-12 schools and public libraries be included in the broadband mapping initiative going forward.

Respectfully submitted,

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