

**From:** Bert Klimas  
**To:** [mappingrfc](#)  
**Subject:** Comments  
**Date:** Friday, June 22, 2018 3:24:45 PM

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My husband Dave and I were on a conference call with Tim Moyer, Monica Babine, and Carrie Pipinich on June 18, 2018. Below are some of the points I discussed and some background info about our county. I'm also including an annotated image of my census block. (Note: the aDSL mentioned in that image is only available in a tiny corner of the census block. CenturyLink promised it "soon" when we moved here in 2007. "Soon" never happened.)

- Stevens County, WA is about 45,000 people. The three largest towns incorporated towns (Colville 4,673; Chewelah 2,607; Kettle Falls 1,595 are all along Highway 395 in the central valley) are now the growing Charter Spectrum fiber territory. The remaining 36,000 people continue to be un- and underserved. That's more than **80%** of the county population. ISPs are all about the density, not the totals.

- Multiple wired and wireless ISPs in the Stevens County Highway 395 corridor/valley. (Low hanging fruit.) Remainder of county is mountainous.

- NoaNet is along Highway 20/395/Colville. CenturyLink's fiber is along Highway 25 but only a little bit on side roads including Orin-Rice which connects Highway 25 in Rice to Highway 395 near Colville.

FYI: Stevens County has approximately 1,500 miles of public road (900 gravel, 600 paved) (Source: **Stevens County** Public Works Department <http://www.stevenscountywa.gov/publicwrks/Road%20Maintenance/Road%20Maintenance.htm>)

- Unknown how many miles are dark fiber, transport or otherwise.

- FCC had a challenge for the mobile maps. Why not do something similar for fixed? Right now the only ways I know to challenge the fixed data (availability, speeds, etc.) are an email to [broadbandfail@fcc.gov](mailto:broadbandfail@fcc.gov) (no response) or a formal FCC complaint.

- There is no motivation for ISPs to be accurate in their Form 477 submissions. Data does not appear to be vetted or audited.

- Indicating coverage where it does not exist hurts because:

- Many grants/programs/loans won't cover areas with >X number of providers.
- ISPs are less likely to go into areas already covered, especially in the lower population densities.
- Areas indicated as covered by high speeds (100 Mbps) that are actually less than the current 25/3 FCC definition of broadband (or totally unserved) will probably never get coverage.

- ISPs indicating where they "could" provide service without an extraordinary commitment of resources (per FCC's Form 477 instructions) is vague and misleading.

- Census blocks can be huge and not a boundary that most laypersons are aware of. Think instead about zip+4 used by the post office. It is an existing database already used by ISPs for billing. Zip+4 are NOT geographic regions. They represent groups of addresses along a road or delivery route. The +4 codes might narrow it down to a block, a building, or single organization.

- Consumers don't easily see local business contact information when looking up ISPs who claim to serve their address. A non-local or holding company name is not user-friendly.

- No accountability by providers after being funded.

- Definitions: There are multiple definitions of the word "rural" that vary by agencies/states/counties/pieces of legislation. I'm also starting to question the use of "unserved" and "underserved."

From the Stevens County/Spokane Tribe Mapping doc:

**1. Bolster the accuracy of the national broadband map and data collection.**

- a. Standardize collection methodologies to avoid provider interpretation of reporting instructions.
- b. Require more granular data than current census block reporting (zip code, number or percentage of addresses covered, lowest and highest advertised speeds, etc.)
- c. Implement a data validation process.
- d. Create a streamlined process for the public to report possible inaccuracies

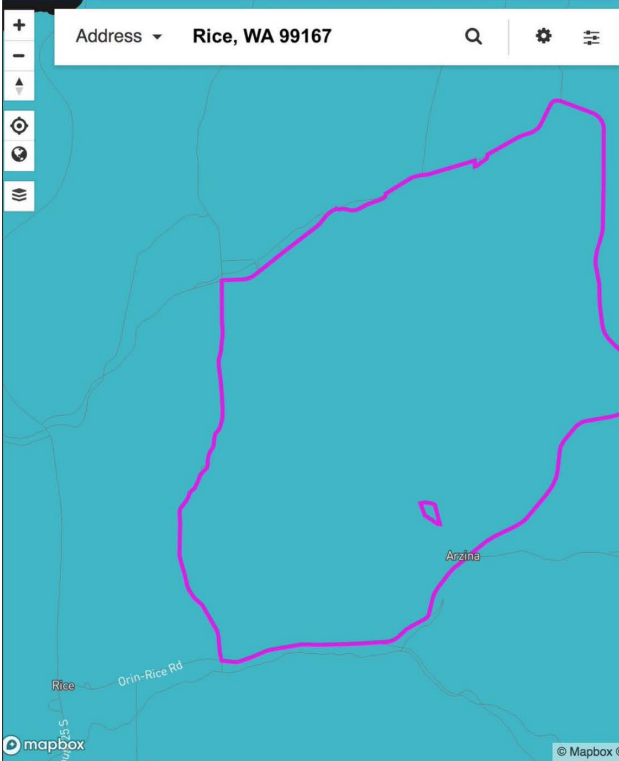
**2. Make the data and information available and more easily usable by a wider audience (local, state and federal policymakers, researchers, community members, etc.)**

- a. Release data sooner (December 2016 data was not released until November 2017.)
- b. Release data files county-by-county instead of state-by-state. Datasets are HUGE downloads even as compressed files; one set of downloaded Stevens County dataset was 36,399 lines.
- c. Provide sample codes, tools, training and other resources to help broadband stakeholders turn raw datasets into usable formats to better understand the wealth of data gathered in order to analyze and make data-driven informed decisions about broadband investments.

**3. Federal funding should be provided to unserved and underserved areas based on accurate maps.**

**4. Collaborate with other jurisdictions to challenge or improve the map.**

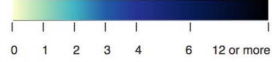
Bert Klimas  
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All Providers Reporting Service

Census block ID: 530659501006089

Number of Fixed Residential Broadband Providers



Broadband

Technology ADSL, Cable, Fiber, Fixed Wireless, Satellite, Other  
Speed  $\geq 25/3$  Mbps

Provider	Tech	Down (Mbps)	Up (Mbps)
Desert Winds Wireless LLC	Fiber	100	100
Desert Winds Wireless LLC	Fixed Wireless	100	100
Desert Winds Wireless LLC	Other	100	100
Desert Winds Wireless LLC	Fixed Wireless	100	100
StarTouch Broadband	Fixed Wireless	25	25
dishNET Holding, LLC	Satellite	15	2
CenturyLink, Inc.	ADSL	10	0.768
ViaSat, Inc.	Satellite	5	1
VSAT Systems, LLC	Satellite	2	1.3

Provider does not serve area

Residential service not available

Does not meet FCC's minimum 25/3 definition for broadband