

Response to Improving the Quality and Accuracy of Broadband Availability Data Docket

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The North Carolina Department of Information Technology's Broadband Infrastructure Office applauds NTIA's initiative to derive more granular data to improve the identification and mapping of areas served and unserved by broadband. As the State agency responsible for identifying unserved areas and developing policies to connect the unserved, data collection and analysis remains one of our biggest challenges. The lack of accurate data affects public policy and funding efforts. It is vital to the development of good public policy and to the efficient use of capital and resources.

The State currently uses data and information from the FCC's Form 477 to develop its baseline broadband map. We have combined this with other data sources, including crowdsourcing and community surveys, to provide more granular data. We also use a subscription service, Fiberlocator, to identify infrastructure. Internally we've mapped all vertical assets and towers. We also rely on partners, specifically fiber optic cable owners such as state agencies, non-profit providers and cooperatives for detailed location of their infrastructure and assets. We use the US Census Bureau data for estimates. Finally, we use CAF II data provided by USAC and state parcel data to assist in identifying specific locations where service does not exist.

Measuring the deployment and access to advance telecommunications capability must include several factors.

Creating an index would give a more accurate diagnosis of the county's broadband health. This may be more comprehensive than determining access, but it would more accurately assess the deployment of broadband and not just internet access or access to a speed threshold. NC BIO has worked with the National Telecommunications and Information Administration (NTIA) on the creation of similar tools.

BIO recommends that the NTIA develop an Availability Index, using data points listed below, to determine access and timely and reasonable deployment. Data could be obtained from annual reports released by the FCC and from the Census Bureau. The values for each indicator should be averaged and assigned a weight (For example, type of technology may be weighted slightly more than data caps.). In addition, qualitative factors, such as potential usage, should be used.

Factors to consider within a framework or index are:

- Infrastructure/type of technology
- Latency, based on technology averages
- Cost
- Competition—the number of consumer choices impacts both innovation and affordability
- Data caps
- Potential Usage (videos, number of devices it can support)

We should NOT continue to use the current methodology to calculate the percentage of Americans with access to fixed advanced telecommunications capability. In the absence of subscription and

infrastructure location from the internet service providers, an index, considering several relevant data layers, can be used to draw a more granular and instructive map. We encourage the NTIA to partner with the FCC on developing a comprehensive tool that would provide a more accurate picture of broadband availability.

North Carolina Broadband Infrastructure Office

The Broadband Infrastructure Office, a division of the North Carolina Department of Information Technology, was established in early 2015 as a statewide resource for broadband availability and adoptions initiatives. The mission of BIO is to provide policy recommendations and planning guidance to community and state leaders to foster the expansion of high-speed internet access with the objective of improving global competitiveness, education, public safety, health care, and government efficiency. In keeping with the belief that organized and informed communities will bridge the digital divide, a technical and community assistance team partners with willing communities to provide on-the-ground assistance to implement those policies and plans.

Submitted by: Jeffrey Sural, jeff.sural@nc.gov, 919-780-3708