Good Morning,

I would like to submit the following as formal comments on Improving the Quality and Accuracy of Broadband Availability Data. Please let me know if you have any questions.

Dear National Telecommunications and Information Administration, regarding your Request for Comments:

As an organization of more than 200 rural service providers, we write to propose that you consider updating the data on broadband accessibility in rural communities by partnering with a national organization to conduct speed tests in rural communities across every state, including Puerto Rico. By using national networks, you can ensure that data quality is maintained to test and gather data on the availability and speed of broadband within rural communities across the country. The current availability of accurate data on rural broadband is wholly inadequate, and as such, needs to be addressed. One way to update the data for rural communities is to utilize organizations with a national reach that are doing work in rural communities in every state, including Puerto Rico, to conduct speed tests across communities to capture better, more accurate, and more timely data points for rural communities across the country. It will be key to utilize a national organization that has reach in every state, including Puerto Rico, to ensure that the data is captured uniformly across the country, and that it has an opportunity to provide accurate data in every community.

RCAP's technical assistance providers live in the rural communities they serve – many have firsthand experience with lack of access to broadband, limited internet service providers or low internet speeds. In addition, they see the impact broadband has not only for the management of small community utilities and critical services but also for community economic development and viability overall. RCAP has observed the data collection approaches and limitations of the Federal Communications Commission's Broadband Map and applauds the National Telecommunications and Information Administration's work to improve the availability of broadband availability and speed data in rural areas.

Background on RCAP:

The Rural Community Assistance Partnership (RCAP) is a network of six regionally based nonprofits and a national office that help rural communities build capacity through access to water, economic development and other capacity building work. RCAP technical assistance providers visit and work directly with community leaders, water operators and water board members to help communities, and has worked with more than 20,000 rural communities in the past decade alone.

RCAP's work had an outsized impact in disadvantaged communities, helping those who need it most. More than 686,000 of residents in communities supported (more than one-fifth or 22%) had low

[1]

incomes, below the poverty line.   Average Median Household Income (MHI) in communities served was approximately $37,000, which is more than $18,000 below the national 2016 MHI. More than 1.04 million residents in communities assisted, or 33.5 percent were people of color.[2] More than 70,300 were American Indian or Alaska Native, 6.8 percent of all people of color and 2.3 percent of all residents served.

How we would take action:

RCAP proposes enlisting its approximately 200 technical assistance providers to run open-source speed-testing software – such as that available through Broadband NOW – every time they visit a community. We would ask staff to run the test a couple times to verify service and then provide test results and specific location details to the RCAP National Office. This would:
- provide a reasonable sample of data from often-isolated areas (gathering data for approximately 1,300 communities in a year),
- allow us to identify gaps,
- and help build a dataset that could factor into the development of a more accurate, detailed map for broadband in rural areas.

Thank you for your consideration.

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[1] 12.7 percent of the overall U.S. population in 2017 lived in poverty, according to the Census.

[2] People of color made up 23.4 percent of the U.S. population in 2017, so RCAP supports a higher proportion of minority residents than reflected in the overall population.