

**STATEMENT OF  
COMMISSIONER BRENDAN CARR**

Re: *Establishing the Digital Opportunity Data Collection*, WC Docket No. 19-195; *Modernizing the FCC Form 477 Data Program*, WC Docket No. 11-10.

Government agencies often struggle with regulatory inertia. Once they adopt a process and everyone gets used to it, things tend to stay that way. They argue about ornaments on a Christmas tree still standing in May. They debate whether to add a new fender to the Pinto. Rarely does an agency commit to a fundamental rethink of the process.

The FCC's Form 477 has been a case in point. The FCC created the form almost 20 years ago to assess local voice competition and collect data on advanced telecommunications. Back then, less than half of Americans had Internet access at home, and almost all of those were on dial-up. Yet today, we're still using substantially the same form to assess the deployment of networks that weren't imagined at the time of the FCC's 2000 Data Collection Order. And over time we've used Form 477 for purposes it wasn't built for.

Over the past 10 years alone, the FCC has made at least a dozen major funding decisions, doling out billions of dollars of USF funds, based on these data sets. These decisions have had real and lasting impacts on communities across the country, affecting education, healthcare, jobs, and the economy. And every couple of years the FCC has added an ornament or two, adjusted the fender, and then moved on.

But today, we get rid of the Christmas tree and stop driving the Pinto. We've heard the message loud and clear that these data sets are no longer good enough. And there's no nibbling around the edges that will change that. So I am glad that this FCC has the courage to say that it is time to start over. Today, we change course and recognize that Form 477 may no longer be fit for its modern uses.

With our new Digital Opportunity Data Collection, we adopt polygon-based maps that will depict with precision the areas where providers actually have broadband networks. We are not going to count entire census blocks as served if just a single location could get service in the future. We direct FCC staff and USAC to start standing up these new maps, so we do not have to rely on Form 477 any longer than necessary. And our new approach empowers the public and the FCC alike to verify the data carriers submit. We're not just going to take carriers at their word.

I want to emphasize this "trust but verify" process and how we've made it more robust than the original draft. This Commission knows that we need to fix our maps, and we know that we must act with urgency. Closing the digital divide is too important of a priority to rely on outdated data. Fortunately, we're not solving this problem by ourselves. Mapping broadband is tremendously valuable to the private sector. It's how companies understand gaps in their networks, inform their engineers, make investment decisions, and even market their services. An entire industry that crowdsources speed tests has sprung up as a result. Many of you probably have one or more of these apps on your phone. And while you always can find a way to improve a particular methodology or map, broadband builders are willing to pay for these data, they are quizzed about them on earnings calls, and they make advertising campaigns centered on them.

So today's decision now makes clear USAC should validate carrier submissions using these commercial applications and resources. I thank my colleagues for agreeing to my edits to push USAC to use these private sector data and to seek comment on a variety of new technologies that may be used to test for mobile coverage.

I am glad that we are standing up this new process. It's time to kick the Christmas tree to the curb and ship the Pinto to the junkyard. I want to thank the Wireline Competition Bureau for its work. This item has my support.