Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Connect America Fund	)	WC Docket No. 10-90
	)	
Connect America Fund – Alaska Plan	)	WC Docket No. 16-271
	)	
The Uniendo a Puerto Rico Fund and the Connect USVI Fund	)	WC Docket No. 18-143
	)	
Rural Digital Opportunity Fund	)	WC Docket No. 19-126
	)	
The Rural Digital Opportunity Fund Auction (Auction 904)	)	AU Docket No. 20-34

REPLY COMMENTS OF THE NATIONAL RURAL ELECTRIC COOPERATIVE ASSOCIATION (NRECA)

The National Rural Electric Cooperative Association ("NRECA") submits these Reply Comments in response to the Public Notice issued by the Federal Communications Commission's Wireline Competition Bureau ("WCB") in the above-captioned proceedings.[1]

NRECA is the national service organizations for more than 900 not-for-profit rural electric cooperatives that provide electric power to 56% of the nation's landmass, including approximately 42 million people in 48 states. America's rural electric cooperatives are deeply committed to promoting the development of broadband capabilities within the rural communities they serve, and often play a crucial role in the development of broadband infrastructure to serve rural unserved and underserved locations. Over 200 rural electric cooperative broadband projects

[1] *Wireline Competition Bureau Seeks Comment on Leveraging the Broadband Serviceable Location Fabric for High-Cost Support Mechanism Deployment Obligations*, WC Docket Nos. 10-90, 16-271, 18-143, 19-126, AU Docket No. 20-34, Public Notice, DA 24-77 (rel. Jan. 25, 2024)("*Public Notice"*).

are already underway across the country, and NRECA estimates that another 100 or so are currently exploring the feasibility of providing broadband.

COMMENTS

NRECA appreciates this opportunity to add to the dialog regarding the use of the Broadband Serviceable Location Fabric ("Fabric") to verify compliance with the deployment obligations of High-Cost program support recipients. As explained below, NRECA supports this objective in concept, but has several fundamental concerns about the Fabric's accuracy and the ability of providers to correct Fabric inaccuracies. NRECA is concerned that at this juncture the Bureau's proposal would create administrative and financial burdens on RDOF participants, especially smaller providers. NRECA therefore supports the tenor of the initial Comments submitted in this proceeding, most of which suggest that WCB should proceed cautiously.

NRECA acknowledges that the Fabric is a work-in-progress, but much work remains before the Fabric should be relied upon to gauge compliance with High-Cost support mechanisms. On numerous occasions, the FCC itself has stated that the National Broadband Map and underlying fabric are iterative and will improve over time. To that end, NRECA respectfully proposes engaging with the WCB to discuss improvements to the process, including the possible addition of a geographic buffer zone and the potential benefit of using electric meter geolocation data, when and where available, to support Fabric development going forward.

A. Neither the Fabric, Nor the Process to Correct Fabric Data, is Sufficiently Developed to Verify High-Cost Program Compliance.

NRECA supports the WCB's overall efforts ultimately to rely upon the Fabric for High-Cost program compliance verification. Eventually, NRECA believes the Fabric can and should replace the High-Cost Universal Broadband portal (HUBB) mechanism, and serve as the single,

unified repository of broadband deployment data in the United States. The Fabric eventually could not just provide the basis for development of the National Broadband Map but serve as a means to confirm compliance with certain High-Cost program deployment milestones.

Based on NRECA member experiences, however, the Fabric is not ready to serve those purposes. Stated simply, there appears to be a significant disconnect between the Fabric and the real world. For example, one NRECA member cooperative reports that "between 10% and 15% of the locations that we are deploying broadband to do not match Broadband Serviceable Locations (BSLs) from the [Fabric] data set." That same cooperative submitted a location challenge specifying about 5,000 locations that should be BSLs – *locations that actually receive broadband and/or electric service from the co-op* – but CostQuest accepted only about 700 of the locations as valid BSLs.[2]

Such underreporting of BSLs within the Fabric is a serious problem in multiple respects. From the High-Cost program participant's perspective, they are unable to get credit for serving locations that demonstrably exist. From the Commission's perspective, the Fabric does not provide an accurate picture of locations that should be served. From the consumer's perspective, their home or business might simply not exist at all, in the eyes of national broadband deployment objectives. Forcing High-Cost support recipients who have fulfilled their buildout obligations to reconcile location differences would add significant administrative and financial burdens to support recipients, and particularly to small providers. In this vein, NRECA agrees with the comments submitted by the Rural Electric Cooperatives Providing Broadband (RECPB).

[2] One possible explanation for this disparity could be that the latitude/longitude for the Fabric data point is located within the center of the structure on the property, while a provider's GIS data may use the location of the electric meter or ONT, which is typically located on one side or the other of the structure or the property. WCB should consider implementing a geographic buffer to address this, as further described in Section C below.

B. The Current Challenge Process is Onerous and Ineffective, and Alternatives are Needed.

If providers and consumers could readily address inaccurate Fabric data, the shortcomings described above would be manageable, and over time, would probably not exist at all. Unfortunately, the Fabric location challenge process at this stage is proving to be far too onerous. While submitting a bulk location challenge is not itself difficult, the requirement to submit a .pdf document "proving the case" for each location is prohibitively burdensome. Even when an entity is able to provide specific latitude and longitude information for large numbers of individual locations (*e.g.*, in the thousands), and even when a location challenge is grounded in demonstratable, on-the-ground facts (*i.e.*, electric service and/or broadband service to the location), the challenge may still be inexplicably denied, as noted above.

NRECA members also report frustration with the lack of communication regarding the outcome of challenges. One co-op explained, "[a]fter submitting the Fabric challenge data to the FCC, we never received a list of locations that were accepted/denied. It would be nice to know where location challenges were not accepted and why." Another received the results, but only six months later. This is far too long for High-Cost support recipients that are subject to established program build out milestones, and an avoidable impediment to effective buildout.

In short, in the experience of NRECA members, the current Fabric location challenge process has been onerous, frustrating, opaque, and ineffective. These experiences, of course, do not encourage parties to correct the Fabric data. To enable the BSL Fabric to become more accurate and to develop into the useful tool it promises to become, the WCB and the Commission should strive to implement a process that instead *encourages* corrections to Fabric data.

C. WCB Should Consider Implementing a Geographic Buffer Zone Surrounding the Fabric BSL Point.

While NRECA has not extensively researched this issue, it appears there may exist a significant discrepancy between the latitude/longitude of the BSL point included in the Fabric, and the GIS data submitted by providers via the HUBB or as part of a Fabric challenge.

In rural areas in particular, the electric service meter may be located at a point considerably removed from the center of the property, or the structure within the property. Often, a broadband terminal (ONT, *etc.*) is sited near the electric service meter. Cooperatives that geolocate electric service meters and broadband connections may find that those locations do not correspond to the BSL point of reference included in the Fabric. The problem seems to be considerable. As one NRECA member cooperative reported: "The vast majority of the geolocations from CostQuest do not match our meter data."

In rural areas, a geographic buffer zone of a certain number of feet might need to be implemented to allow a provider's GIS data to correlate with the Fabric data point, even if the provider's GIS data reflects a physical location some distance away from the Fabric data point.

NRECA encourages the WCB to further explore this issue.

D. Location Challenges Based on Electric Meter Geolocation Data Should be Presumptively Valid.

NRECA respectfully suggests that WCB and CostQuest could make more effective use of electric service meter geolocation data, which could address many of the concerns raised in these Reply Comments. Electric service meter geolocation data is a useful metric for this purpose because:

- Electric service is necessary to receive broadband service;
- Electric co-operatives know precisely which locations receive electric service; and

- Broadband terminal equipment is often located alongside (or very near to) electric meters.

For these reasons, a Fabric location challenge submitted by an electric service provider that is based on electric meter geolocation data should be treated as presumptively valid and should be immediately approved by CostQuest and the Commission without further substantiation from the provider.

Outside of the challenge context, NRECA suggests that electric meter geolocation data could potentially serve an important role going forward to increase and confirm the accuracy of Fabric data. While some complications exist,[3] NRECA invites further conversations with WCB about how electric meter geolocation data may be put to such use.

Respectfully submitted,

National Rural Electric Cooperative Association

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[3] For example, not all electric meters are geolocated, and similar to the HUBB and Fabric not all of the data is 100% accurate. Further, not all cooperatives may be willing to provide access to such data, and there may also be individual privacy concerns that would need to be addressed. Additionally, some properties – especially in rural and agricultural areas – may have multiple electric meters.

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