

July 9, 2020

**VIA ECFS**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

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

Dear Ms. Dortch:

On Wednesday, July 8, 2020, the undersigned, together with Larry Thompson from Vantage Point Solutions, held a telephone conversation with Preston Wise, rural broadband advisor to Chairman Ajit Pai, to discuss matters in the above-referenced proceeding.

The parties reiterated our commitment and desire to assist the Commission in achieving improved broadband data collection and maps. The current data and maps have long hampered efforts to bridge the digital divide and frustrated efforts to make good policy. We were pleased to see the Commission proposing action to address the mapping issue. However, we have concerns with some aspects of the proposed rules. Specifically, provisions that fail to recognize the well proven, real-world capabilities of fiber as well as the realities of deploying broadband in rural America.

In our call, we expressed support of the NTCA and Vantage Point opinion in a July 6 ex parte filing<sup>1</sup> that the 6,600 foot rule in paragraph 17 of the *Draft Mapping Order* should not be broadened to include Fiber to the Premise (FTTP) technologies. Today's ITU and typical network design standards allow for GPON to deliver services for customers within a range of 20 kilometer (km) to 60 km cable distance of the optical line termination (OLT; the service delivery electronics).<sup>2</sup> In rural America today providers are consistently seeing GPON equipment serve customers at distances of 40 km<sup>3</sup> to 45 km<sup>4</sup> or more. The maximum standard buffer

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<sup>1</sup> *Ex Parte filing* of NTCA on July 6, 2020, available at:

<https://ecfsapi.fcc.gov/file/10706096165102/7.1.20%20Mapping%20letter%20w%20attach.pdf>. NRECA also consulted with NRTC and can confirm they also support this opinion.

<sup>2</sup> SERIES G: TRANSMISSION SYSTEMS AND MEDIA, DIGITAL SYSTEMS AND NETWORKS Digital sections and digital line system – Optical line systems for local and access networks, Gigabit-capable passive optical networks. (GPON): General characteristics, ITU-T G.984.1, 03/2008. (<https://www.itu.int/rec/T-REC-G.984.1>).

<sup>3</sup> CALIX Frequently asked questions about GPN <https://community.calix.com/s/question/0D50g00004pX3k7CAC/frequently-asked-questions-about-gpon>, March 25, 2020.

<sup>4</sup> The second page of the Adtran GPON spec sheet (<https://portal.adtran.com/web/fileDownload/doc/32117>) shows the equipment can reach up to 45 km when using a 16x split.

allowed should not exceed the 60 km (37.2 miles) threshold established by the ITU standard, absent a waiver or providing additional data. Included with this ex parte is an map of an NRECA member cooperative fiber network deployment that shows a fiber run (highlighted in yellow) that is 13.8 miles long which is considerably farther than the 6,600 feet in the draft order and also beyond 20 km.

Certain technologies, such as active optical networks (Active Ethernet or “AE”), defined by the IEEE<sup>5</sup>, are already serving customers at distances as far as 80 km. Accordingly, the standard should accommodate these real-world deployments and these standards should be periodically reviewed and updated as technology advances. Providers utilizing distances above the 60 km ITU standard buffer threshold could submit a waiver or additional information on their network configuration with their Form 477 for FCC review.

NRECA and Vantage Point also clarified that in FTTP deployments the length of the drop is not relevant since there is no difference, technology wise, between the main line fiber and fiber drops. Therefore, it was recommended that the limit on the length of fiber drops be removed from the *Draft Mapping Order*.

Finally, NRECA and Vantage Point made the point that any review of long fiber runs extending beyond the proposed 60k maximum limit associated with this data collection should not in any way cause a delay in high-cost USF recipients meeting associated build out milestones and obligations. If a waiver is required, a provider should be able to file a single waiver for all locations beyond 60 km instead of individual waivers for each location.

Thank you for your attention to this correspondence. Please contact the undersigned if you have any questions about this submission. Pursuant to Section 1.1206 of the Commission’s rules, a copy of this letter is being filed via ECFS.

Sincerely,

/s/ Brian M. O’Hara  
Senior Director Regulatory Issues –  
Telecom and Broadband  
NRECA

cc: Preston Wise

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<sup>5</sup> IEEE 802.3.



