

## Ongoing National Broadband Map Issues

### Key Findings:

- While the new National Broadband Maps are a significant improvement, numerous errors and inaccuracies persist.
- Congress should no longer rely on advertised speeds and availability to measure connectivity via the National Broadband Maps. Expanding the maps' focus to include quality of service and acceptance of speed-test verification for fixed service should be a priority, especially as federal programs continue to rely on these maps to guide federal funding decisions.
- While mobile 5G service has tremendous value, Congress should not allow mobile 5G or 4G LTE service to be characterized as fixed wireless access in the National Broadband Maps.

### Background

The Federal Communications Commission collects self-reported, location-level data from Internet Service Providers through a Broadband Data Collection twice per year. This data reflects the advertised availability of broadband service or where it could be installed within 10 business days, as reported by ISPs in those areas.

The new National Broadband Maps, which now reflect location-by-location based data rather than the previously used census-block level data, are a significant improvement. However, numerous errors still persist in reported broadband availability. The FCC's reliance on advertised rather than actual speeds does not accurately reflect reality, with some providers overstating service availability or capabilities in their BDC filings. In some instances, providers might promise service of "up to" 100/20 megabits per second while failing to consistently provide that level of service. Despite allowing for individual speed-test challenges to mobile service claims, the FCC has denied the use of speed tests to verify service claims for wireline and fixed wireless access. Additionally, some providers offer mobile hotspots that use a 5G or 4G LTE signal, marketing it as in-home broadband service and reporting this mobile service as fixed wireless access in BDC filings.

### Proposed Solutions

Reliance on advertised speeds and availability as a way to measure connectivity will continue to leave rural consumers without reliable broadband access. While the focus on "access" to fixed broadband service made sense in the initial maps, expanding the focus to include "quality" of service should be a priority, especially as Congress and the FCC rely on the maps to guide federal funding decisions. Allowing for the submission of speed-test data as part of a map challenge will help verify that providers are meeting their obligations and rural consumers are not inadvertently left behind.

Additionally, the characterization of mobile 5G or 4G LTE wireless service as fixed wireless service should not be allowed when mapping fixed broadband access in rural areas. Fixed wireless service provides a more reliable connection with more consistent speeds than mobile service. It also is less likely to employ data caps or impose additional fees for overages. Mobile access is not equivalent to fixed wireless service and improperly skews the BDC data in rural and hard-to-reach locations, making it more difficult to serve rural consumers with fixed broadband service.