

July 17, 2018

The Honorable Marsha Blackburn
Chairman
Committee on Energy and Commerce
Subcommittee on Communications and Technology
U.S. House of Representatives
Washington, District of Columbia 20515

The Honorable Mike Doyle
Ranking Member
Committee on Energy and Commerce
Subcommittee on Communications and Technology
U.S. House of Representatives
Washington, District of Columbia 20515

Dear Chairman Blackburn and Ranking Member Doyle,

We commend you for holding today's hearing, "Realizing the Benefits of Rural Broadband: Challenges and Solutions." Representing more than 5,000 app developers and connected device companies in a \$950 billion industry that employs 4.7 million Americans, ACT | The App Association cares deeply about rural broadband deployment. We applaud the Subcommittee for driving attention to the added productivity and life-saving benefits broadband brings to rural communities and the paths to realize those benefits.

The benefits of rural broadband deployment are especially pronounced in the healthcare context. The University of Mississippi Medical Center (UMMC)—a steering committee member of the App Association's Connected Health Initiative—has used its telehealth and remote patient monitoring programs to produce substantial healthcare savings and improved patient outcomes. However, UMMC continues to encounter the frustrating obstacle of inconsistent broadband service in Mississippi. UMMC serves a variety of remote patients with serious chronic conditions, but many report their inability to download or upload even small amounts of data unless they go to a local McDonald's, or in some cases, a nearby hilltop. Incidentally, many of these rural and semi-rural patients experience much higher rates of chronic illness than their urban counterparts, and they could substantially benefit from in-time notices and real-time data uploads for their physician to review. This means that broadband at *home* is especially important and offers greater opportunities for this community.

As Chairman Blackburn noted, the Subcommittee has set its sights on reauthorizing the National Telecommunications and Information Administration (NTIA), and this hearing offers a timely opportunity to explore how NTIA can help bridge the digital divide. We believe NTIA is poised to contribute to broadband mapping to better understand the

extent of broadband access across the country. In fact, NTIA recently opened a request for comment (RFC) seeking feedback in several areas including the location of existing broadband datasets, how best to ensure uniformity across the data NTIA reports, and how to validate collected data.

As NTIA moves forward with its proceeding, it is important to note that the Federal Communications Commission (FCC) is also taking positive steps to improve broadband deployment data collection, including suggesting adjustments to its Form 477 filings. For example, the FCC asks whether it should require internet service providers (ISPs) to indicate whether they have subscribers in a given census block and whether additional subscribers could be added within a standard interval. The NTIA notes, “the United States is divided into over 11 million blocks, 95 percent of which do not exceed 1 square mile in land area . . .” suggesting that reporting at the census block level provides a high level of geographic granularity. We agree that Census Block level reporting is geographically granular. However, we support the FCC’s proposed update to better indicate where subscribers currently exist and could be added quickly. Such an update would be an improvement over the current data collected, which indicates in which Census Blocks ISPs make broadband “available.” We are also supportive of efforts at NTIA and the FCC to collect and report on broadband deployment data that show more visually—such as with shapefiles or rasters—where subscribers exist, where they are not, and where they could quickly be connected. We have found this kind of data to be more useful from a data visualization perspective.

We applaud this Subcommittee for continuing to explore the benefits of rural broadband and the challenges to its deployment. The near-trillion-dollar app economy depends on broadband to run, and Americans across the country rely on reliable access to reap the benefits of telehealth, remote services, and the full complement of innovations our members create. Accurate broadband mapping is crucial to successfully implementing Connect America Fund-supported and industry-led efforts to deliver broadband to rural and unserved parts of the country, using a mix of last-mile technologies from wireline to licensed and unlicensed wireless deployment. We must understand where those communities are and what their needs may be, which can only be done with the implementation of comprehensive, granular, and accurate broadband coverage maps. We look forward to serving as a resource for this Subcommittee on this endeavor going forward.

Sincerely,

A handwritten signature in black ink that reads "Morgan Reed". The signature is written in a cursive, flowing style.

Morgan Reed
President
ACT | The App Association