

Attachment—Additional Questions for the Record

**Subcommittee on Communications and Technology
Hearing on
“Legislating to Connect America: Improving the Nation’s Broadband Maps”
September 11, 2019**

Mr. James W. Stegeman, President/CEO, CostQuest Associates

The Honorable Anna G. Eshoo (D-CA)

1. I’m concerned about potential privacy implications of a private party managing a vast agglomeration of data that may include specific and granular geolocation data of the residences of millions of Americans. In the pilot program you described, do any of the systems you’ve built or maintained contain personally identifiable information such as names, Social Security numbers, or other unique identifiers that links geolocation data of a potential residence to the identities of individuals, families, or households that live there?

Response: While the publicly available data sources we acquired provided property owner names (part of the data that is made available by county assessors), we did NOT retain any personally identifiable information, including owner name, Social Security numbers, or any information that identifies individuals, families or households, in the created Broadband Serviceable Location Fabric (“BSLF”) Pilot dataset. The same holds for any future BSLF development we are undertaking, regardless of whether we use public or proprietary, 3rd party vendor data. We have no intention to retain any personally identifiable information in any BSLF data we create. The BSLF simply contains the address, latitude and longitude, count of units at the address, and an indication of the land use (residential, business, etc..)

- a. If so, are you currently selling, sharing, transferring, or otherwise disclosing any such information to companies or other third-parties?

Response: Not applicable.

2. Are you currently prohibited by contract or law from disclosing any personally identifiable information relating to geolocation data of residences?

Response: As a general practice, we avoid the use and disclosure of personally identifiable information. Many times, this requirement is in the contract we have with clients. In regard to the BSLF, while our contracts with the public vendors we are using for the creation of the BSLF do not restrict our use of the data they provide to us, we have no intention of including this type

of data in our created file.

3. Are you aware of any current, planned, or potential uses the data related to the national fabric for marketing or advertising purposes by companies?

Response: Given that we will not include personally identifiable information in the BSLF, the only potential marketing or advertising programs the BSLF could support are general mailers to the “Current Resident”.

We would note that under the FCC rules for new broadband buildouts by carriers using FCC funds, the addresses built to by the carriers must be publicly filed at USAC’s Hubb portal. We imagine that in addition to the other datasets that carriers use to derive the location data for the Hubb filing, the BSLF may be used in a similar manner.

4. Please recommend any safeguards that this Subcommittee, the Congress, or the FCC could require to ensure that geolocation data of residences that may result from our efforts to improve broadband maps is not abused, including for marketing purposes.

Response: We would suggest at least the following:

- The fabric that is adopted be restricted from including personally identifiable information.
- Any fabric that is adopted be made available as restricted or limited in use. That is, a consumer can type in their address and view the information of a single address. However, anyone who downloads multiple records must adhere to limitations on use, including the inability to resell, repackage, distribute, and/or re-license the data and derivatives, limitation on use to create mailing list or to use to communicate with a residence, etc..