



June 17, 2024

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
45 L Street, NE  
Washington, DC 20554

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

Dear Ms. Dortch:

On Friday, June 14, 2024, the undersigned on behalf of NTCA–The Rural Broadband Association (“NTCA”), spoke with Justin Faulb, Lianna Dumeng, and Laythan Oweis from the office of Commissioner Geoffrey Starks regarding broadband availability mapping and Broadband Data Collection (“BDC”) processes.

Consistent with recent advocacy, NTCA highlighted several issues that it hoped the Federal Communications Commission (the “Commission”) would act upon or take up for further consideration, as appropriate, in the Order and Declaratory Ruling and notice of proposed rulemaking now circulating with respect to BDC updates and proposals for additional action based upon “lessons learned.” *See FCC Makes Updates to Broadband Data Collection Efforts*, News Release (rel. May 22, 2024). In particular, NTCA urged the Commission to: (i) strengthen reporting verification efforts; (ii) enable greater use of performance and subscription data to inform challenges and otherwise to update several BDC challenge codes; (iii) close loopholes that allow providers to avoid submitting data to back up coverage claims; (iv) update procedures to overcome successful or conceded challenges through reasserted claims of availability; (v) consider changes to reporting standards to reflect proven technological capabilities on an objective engineering basis in lieu of accepting advertising-based claims alone; and (vi) review the use of BDC data in making better-informed decisions that affect broadband funding and policy. *See Ex Parte Letter from Michael R. Romano, Executive Vice President, NTCA, to Marlene H. Dortch, Secretary, Commission, WC Docket No. 19-195, et al.* (filed May 2, 2024), at Attachment, pp. 23-26; *see also Comments of NTCA, WC Docket No. 19-195, et al.* (filed Feb. 19, 2024), at 2-9.

Thank you for your attention to this correspondence. Pursuant to Section 1.1206 of the Commission’s rules, a copy of this letter is being filed via ECFS.

Sincerely,

/s/ Michael R. Romano  
Michael R. Romano  
Executive Vice President

cc: Justin Faulb  
Lianna Dumeng  
Laythan Oweis