Testimony of

J. Brent Legg
Vice President of Government Affairs
Connected Nation

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Mapping Broadband Availability in Kansas

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Chairman Olson, Vice Chairman Petersen, Ranking Member Hawk, and members of the committee, thank you for the opportunity to share Connected Nation's insights on the important topic of broadband data collection and mapping. My name is Brent Legg, and I am Vice President of Government Affairs for Connected Nation, a national non-profit organization with a 16-year history of improving lives and strengthening communities through increased access to, and adoption of, broadband and related technologies.

Headquartered in Bowling Green, Kentucky, Connected Nation's work has impacted more than 30 states, and we served as the nation's single largest grantee under NTIA's State Broadband Initiative (SBI) grant program. Under SBI, we managed broadband mapping and planning projects across 12 states and 1 territory, representing 42% of the U.S. landmass, and our mapping and data validation techniques have been widely recognized as "best practices" by NTIA, the FCC, and others. CN also has a long history working at the grassroots level in more than 600 communities through initiatives like our Connected Community Engagement Program (Connected[SM]), in which we help local leaders build comprehensive technology action plans for their communities.[1]

Our work on the ground in these communities has helped us develop an intimate understanding of the impact that broadband has on rural and urban areas alike, and there can be no doubt that accurate and granular broadband

[1] http://connectmycommunity.org/

mapping is one of the most critical tools in developing sound broadband policy to close the Digital Divide.

Reliable broadband mapping is a matter of critical importance to residents, businesses, and community anchor institutions in areas where robust broadband is lacking, as any good map should give voice to those who find themselves on the wrong side of the Digital Divide by prioritizing the closing of those gaps. We strongly believe in the importance of accurate and granular broadband data collection and mapping for three reasons:

1) To inform better decision-making on where public resources should be invested to support broadband buildout,
2) To avoid potential overbuild situations where service may already be available at a comparable speed and cost, and
3) To ensure accountability for the ratepayer and taxpayer dollars once public investments have been made.

When federal funding for the SBI state broadband mapping grants ran out in 2014, the FCC and other federal agencies began to rely on what is known as "Form 477" data to understand the extent of broadband coverage in America. Earlier this month, the FCC rolled out an updated National Broadband Map using 477 data. Unfortunately, this data isn't sufficiently granular to adequately inform policymaking or decision-making at the state or federal level.

Form 477 requires broadband providers to report census blocks where they provide service. Unfortunately, if even one household in a given census

block is served, the entire block is considered as having service, resulting in a significant overstatement of availability. This is particularly problematic in rural areas where census blocks can be very large. In fact, there are 7,322 census blocks in Kansas that are larger than 2 square miles in size, comprising about 28,252 square miles, or 34.33%, of the state's land area. These rural areas are where broadband availability is most lacking and needs to be most accurately defined, yet these are the areas where federal data on broadband availability is the least specific.

The map that you have in your packet shows where FCC Form 477 data indicate broadband service availability of at least 25 Mbps downstream and 3 Mbps upstream. Every area shaded in red, yellow, or green is considered by the FCC as having service, and those areas are therefore ineligible for the federal USF programs that support broadband buildout into unserved areas. The colors on the map were derived from a scoring process that we developed to score each census block on the likelihood that broadband is available to every household in that block. Criteria used in this scoring process include the physical size of the block, number of providers reporting in the block, the household density of the block, the type of providers reporting in the block, and a few other factors.

The areas in green are census blocks, where, according to our scoring analysis, it is likely that service is available to all households within the block. The areas in red are census blocks where the opposite is true—where it is highly

unlikely that all households are served. These are the areas that warrant further investigation and where street-level or parcel-level data instead would paint a much more accurate and granular picture of the state's broadband landscape.

Until Congress fixes this issue, the Kansas Legislature should consider enacting a bill that would create a reasonable process to collect and map broadband data at the street address or land parcel level of detail, with an understanding of provider name, service type, and speeds available at each serviceable location. This can be done in a way that protects service providers' proprietary and confidential information from public or government disclosure and could even include a provision that would provide assistance at no charge to service providers that may need assistance in submitting their information. The Nebraska Legislature has proposed a similar bill this session, LB1114, and the State of Minnesota has an active broadband mapping program in place to guide how state funds are distributed under their "Boarder-to-Boarder Broadband Grant Program."

For all the reasons discussed here today, we believe it would be prudent for the Kansas Legislature to address this very fixable problem—and provide policymakers like yourselves, the Governor's Office, and the Kansas Corporation Commission with the information you need to ensure that all rural Kansans have the ability to connect. I look forward to answering any questions that you may have. Thank you.