

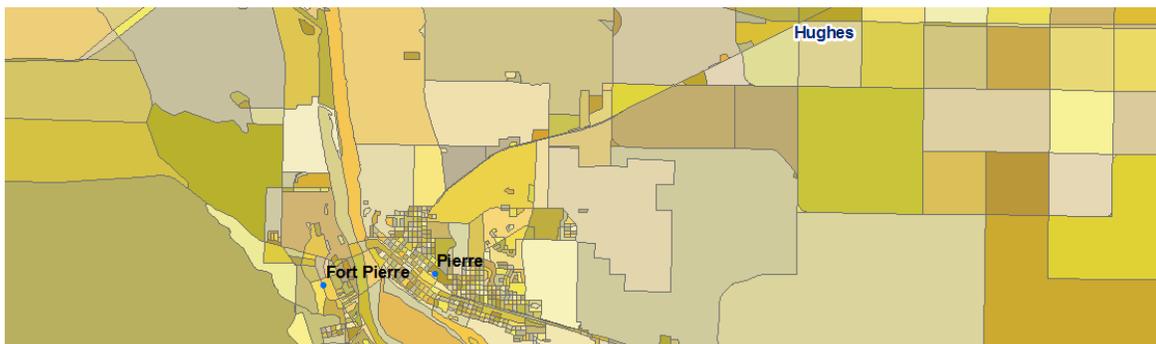
TO: COMMISSIONERS AND ADVISORS
FROM: BRIAN ROUNDS
SUBJECT: TC13-027 – CARRIERS PROVIDING ADDITIONAL BROADBAND INFO
DATE: APRIL 22, 2015

STAFF MEMORANDUM

At the March 31, 2015, Commission meeting, the Commission discussed potentially requiring carriers to provide additional information regarding broadband deployment in the ETC certification process. As part of the discussion, Staff agreed to work with the carriers to investigate the issue further, and the matter was ultimately deferred.

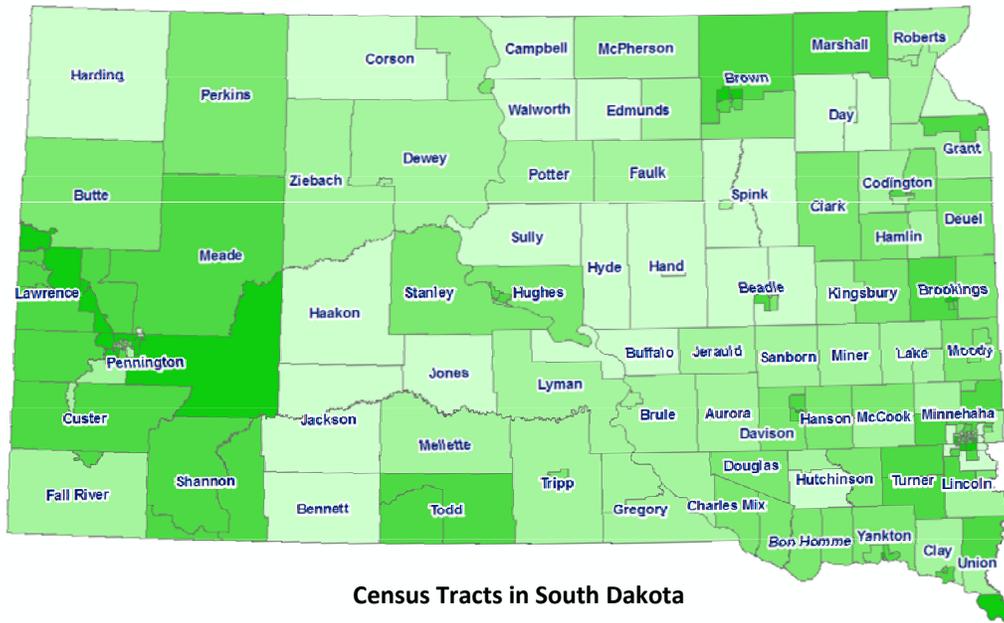
Staff has been working with the South Dakota Telecommunications Association (SDTA) to understand the filings required by the FCC and whether those can be utilized in our process. FCC Form 477, which collects information about broadband connections to end user locations, was the focus of our discussions. SDTA provided a confidential copy of one of its member's Form 477 submissions for Staff's review.

All facilities-based providers of broadband connections¹ to end user locations are required to file a completed Form 477 with the FCC. Some of the data required includes the total number of broadband connections, number of residential connections, technology used to deploy the connections, maximum download/upload speeds subscribed, and maximum download/upload speeds advertised. The maximum advertised speeds are provided by census block, each of which can be as small as a city block or as large as a few square miles. The subscriptions data, however, is provided by census tract, each of which can be as large as a county. The maps below show the resolution provided by census block and census tract data.



Census Blocks in the Pierre Area

¹ Broadband connections of 200 kbps or less are excluded



Census Tracts in South Dakota

Staff expressed some hope at the March 31, 2015, Commission meeting that we could create useful maps of broadband deployment using the Form 477 data. Upon further review, mapping this information provides little insight while being somewhat labor-intensive. The majority of useful information is provided by census tracts, which simply don't line up well with exchange boundaries.

That being said, the data itself provides information on the levels of broadband being offered and subscribed to across each carrier's footprint that would be useful in assessing a carrier's broadband deployment efforts. It is our understanding that most, if not all, carriers are providing their Form 477 data to the FCC in spreadsheet form twice a year, on March 1 and September 1. Thus, we do not believe it would be overly burdensome to require carriers to submit their most recently submitted Form 477 data with their annual requests for ETC certification.

Staff recommends the Commission require carriers to include their most recent FCC Form 477 submissions in their annual requests for ETC certification.