

**Via ECFS**

May 12, 2021

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, NW  
Washington, DC 20554

Re: Ex Parte Notice, WC Docket No. 19-195, *Establishing the Digital Opportunity Data Collection*; WC Docket No. 11-10, *Modernizing the FCC Form 477 Data Program*

Dear Ms. Dortch:

On behalf of the Precision Ag Connectivity & Accuracy Stakeholder Alliance (PAgCASA), this ex parte submission is made at the request of the Commission's Staff in connection with the captioned FCC proceedings.

On April 20, 2021, Garland T. McCoy, and Ed Ingle of PAgCASA participated in a video conference with Jean Kiddoo, Chair, FCC Broadband Data Task Force, and her Task Force colleagues John Cobb, Legal Advisor, Sean Spivey, Senior Counsel, and Chelsea Fallon, Senior Implementation Officer. At the conclusion of the meeting Task Force Chair Kiddoo requested a one-page document detailing PAgCASA's crowdsourced "ground truthing" recruitment and assistance methodology. Shortly after we sent the document to Task Force Chair Kiddoo and her staff we were asked by John Cobb to attach the document to this Ex-Parte letter so that the document could become part of the public record and be critiqued further. That document, entitled "A People Centered Broadband Data & Mapping Campaign; Maps to Bridge the Gaps," is attached for the record.

PAgCASA is a not-for-profit education foundation whose mission is to design, field test, and deploy technical and policy tools needed to ensure accurate broadband mapping. The April 20th discussion focused on the standardized, open-source, turn-key tool kit PAgCASA has developed for consumer recruitment and assistance with an open invitation and list of partnerships and alliances capable of casting a nation-wide net to recruit and assist consumers in generating accurate data, video documentation, and other material for posting on a public platform where the data and accompanying content would be displayed in its raw form, granular and free of any proprietary code encumbrances. In that meeting, we signaled our hope that the FCC would see our initiative as a third-party component to help inform and "ground truth" their new Broadband Mapping Program. We ended by detailing how we had vetted out our initiative with leaders in the technical, academic, and broader stakeholder communities.

The attached document details a standardized crowdsourced recruitment and assistance methodology build on open-source software to ensure data transparency and interoperability, operating on a single online platform for data recording and challenge. Such a turn-key

crowdsourced campaign to recruit and assist current and potential broadband consumers in generating the individual granular data needed to inform and validate the FCC's Broadband Maps is called for in both congressional legislation, namely the Broadband Data Act (PL 116-130), and in the FCC's WC Dockets referenced above and below.

We would like to point out specific sections of the Broadband Data Act and the current FCC WC Docket No. 19-195 *Establishing the Digital Opportunity Data Collection*, and WC Docket No. No. 11-10 *Modernizing the FCC Form 477 Data Program* dealing with the collection, posting and challenge of standardized granular crowdsourced data by third party groups where we believe we would provide an important role. The Broadband Data Act Sec. 802, **BROADBAND MAPS** (A) "require the biannual collection and dissemination of granular data, as determined by the Commission-- relating to the availability and quality of service with respect to terrestrial fixed, fixed wireless...broadband internet access service" and "processes through which the Commission can verify the accuracy of data submitted under subsection (b)(2)." Our goal will be to assist the FCC as a "third party group" in the areas of recruitment and assistance of consumers of fixed wire and wireless broadband service. Specifically, our focus will be in assisting the consumers we have recruited, and any others who need help, to ensure the data collection, documentation and posting is as accurate as possible and that the entire engagement is standardized such that broadband speed and latency test data, no matter where they are generated or by whom, are able to stand as valid data when presented on a publicly accessible online platform.

Our goal will be to keep in touch with those who have participated, posted data, such that we can re-engage over time and get actionable benchmarking data to highlight broadband access status. We want to showcase progress or where further resources and attention might be needed through our "living" web platform. Our goal is equitable broadband access, no one left behind.

Additional areas that support our third-party methodology would be SEC. 802. **Broadband Maps. (2) Other data-** "In issuing the rules under paragraph (1), the Commission shall develop a process through which the Commission can collect verified data for use in the coverage maps from--(B) third parties, if the Commission determines that it is in the public interest to use such data in--(i) the development of the coverage maps or (ii) the verification of data submitted under section (b);" and in the WC Docket No. 19-195, 11-10 1.7006 **Data Verification**, (d) (1)(i)(ii)(iii), 1.7008 **Creation of broadband Internet access service coverage maps**. (d)(1)(2)(3), **J. Details on the Creation of the Coverage Maps** 148. "We also adopt the proposal to create two other maps that identify carrier-specific fixed and mobile coverage data, including reported technologies and speeds by provider." PAgCASA will focus exclusively on the fixed wire and wireless map and **K. Technical Assistance** 149. "The Broadband DATA Act requires the Commission to hold annual workshops for Tribal governments in each of the 12 Bureau of Indian Affairs Regions." PAgCASA's recruitment and assistance initiative will be coordinated with the workshops and continuing needs of the Tribal governments and communities such that appropriate and coordinated assistance is provided on an ongoing basis. PAgCASA would also support 150. "The Offices shall publish a public notice announcing the workshop date, time, location and agenda prior to each workshop." In the following sections, No. 151-153 we would coordinate our data gathering and assistance protocols with the "help-desks" specifically discussed in these sections.

In summary, PAgCASA welcomes the opportunity to partner with the FCC and others in the public sector, the private sector, academia, diverse stakeholder communities -- while also utilizing our nation's young people, as well as unemployed and underemployed citizens, in this important “crowdsourcing” and ground-truthing data collection and mapping effort. Simply put we want to help people to help themselves and their communities close the broadband gap and achieve parity with most metropolitan areas across the county by participating in this grassroots data gathering and validation effort.

Accurate broadband maps that collect all the data are essential to inform wise infrastructure investments and effective broadband deployment for communities still left behind. The recent pandemic has underscored the importance of digital equity and connectivity. Every American needs access to fast, reliable, and affordable broadband, which can provide life-saving telehealth, necessary remote learning, an equal playing field for rural businesses, and access to the latest agricultural technologies to help feed our planet in an environmentally responsible manner.

Please do not hesitate to contact the undersigned if you have any questions about this submission.

Respectfully submitted,

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Co-Founder and Executive Director  
Precision Ag Connectivity & Accuracy Stakeholder  
Alliance  
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**A People Centered Broadband Data & Mapping Campaign**  
**“Maps to Bridge the Gaps”**  
**PAGCASA**

**Critical Components and Methodology** (draft 4/26/21)

**Robust, Secure, Interactive Website**

- To publicly post data while protecting individual privacy.
- Check list of items that participants will need to have ready before they run and document their Internet speed test (e.g., a smart phone with camera to document testing process, most recent ISP bill-redacted, attestation as to reviewing the instructional videos, etc.).
- Instructional video tutorials and all content provided to guide participants (in English and Spanish) through the *standardized* data gathering, documentation, and posting process (e.g., tutorials demonstrating video capture of pre-testing steps, how to de-activate router’s Wi-Fi and how to connect computer that will run speed test directly to router).
- Information on where to find free-to-use devices (smart phones without sim cards and router-to-computer cable) they will need to document and run their speed test.
- Skilled volunteers to staff the live interactive web chats and help line.

**Nationwide Crowdsourcing Network Partners**

- Partnerships with well-established and trusted entities in rural and urban regions and the recruitment of in-the-field volunteer areas organizers. Organizations would include (sample list); SHLB (Schools, Health & Libraries Broadband Coalition), Land O’ Lakes American Connection Project Broadband Coalition, State Farm Bureau(s), FFA (Future Farmers of America), 4-H, Urban League, Tribal Broadband, PCI (People Centered Internet), ISOC (Internet Society), and Marconi Society, M-Lab.

**Target Groups of Citizens to Participate, and Outreach Program to Recruit Them**

- Households and small businesses who have tried to get land-based Internet access (Broadband) but have been told it is not offered in their area (via personal outreach, posters with partner organizations, local public service spots on radio/TV, etc.--all highlighting a number to call or QR code to scan that will prompt the caller through a series of pre-recorded questions and capture the information needed).
- Household and small businesses who are using dial-up modems as their only “on ramp” to the Internet (we would want them to post pictures of their modem to validate along with zip code to give general location).
- Broadband customers who have the “premium” Internet/Broadband service package offered by their carrier (ISP or Telco) which will be validated by the video/picture of the redacted bill (personal information including Broadband “package” and price held private and secure but able to be tied back to the publicly posted data if need be and with permission). To be effective we will ask these volunteers to conduct speed tests at three specific times during the day (times TBD) and over the course of two non-contiguous days.

Our “living” broadband data map will be constantly updated to reflect the granular crowdsourced data that will be arriving. The platform and data will be managed on open-source software with data transparency and portability ensured.

We will actively seek out in-kind gifts and awards for our in-the-field organizers and if possible, for all those voluntarily going through the process of documenting a broadband speed test in accordance with our protocol and providing requested supporting documentation.

By following flowchart/steps covered in the website educational tutorials, and providing video documentation and attestations, we will be able to withstand any serious challenges from incumbent service providers.