

# Co-ops Connect FYI

By Jonathan Chambers • Jun 09, 2023

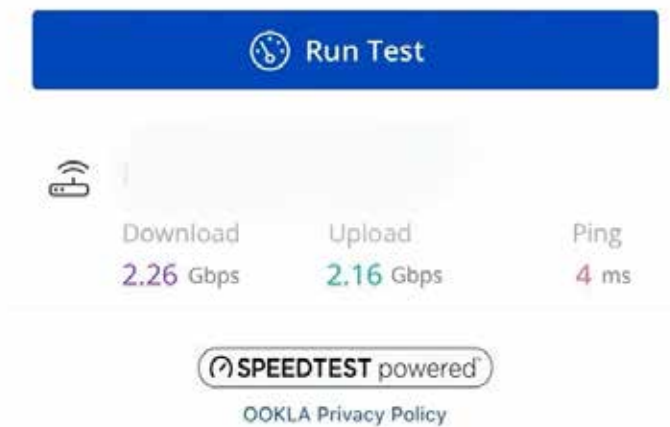
Smart Brevity® count: 4 mins...1053 words

## The New National Broadband Map: It's All About the Reported Speeds



A co-op member sent me this speed test of their new Conexon Connect 2 Gbps symmetrical service:

## Bandwidth Test



Not only does the actual speed match the advertised speed (more on this later), but the latency is just 4 milliseconds. My video-gaming sons would kill for a Ping of 4 milliseconds.

**Doug Dawson**, who writes [the great POTS and PANS blog](#), recently said of the latest National Broadband Map:

“Anybody who is intimately familiar with the FCC maps knows that there is a lot of fiction buried in the reporting. There is one huge flaw in the FCC mapping system that has carried over from the previous FCC mapping regime – **ISPs self-report the speeds they can deliver.** Per the FCC mapping rules, **ISPs can claim broadband marketing speeds rather than some approximation of actual speeds.**” (*emphasis added*)

### A bit of history:

- The National Broadband Map was first created over a decade ago, with funding from the American Reinvestment and Recovery Act (ARRA).
- While the FCC created the map, the data was collected by NTIA supplied mostly by state broadband offices funded by the ARRA.

- When the funding ran out, NTIA declined to continue the maps and punted the whole effort to the FCC.
- The FCC used a data source it had available from ISPs, collected semi-annually. The data collection, on FCC Form 477, includes maximum advertised speed, technology type, and service by census block.
- **Why it matters:** The mapping overhaul undertaken over the past few years has been to collect more granular location data, **but essentially leaves the speed reporting as it has been — advertised speeds.**

### Doug goes on to note:

“In today’s world, I’m always instantly suspicious of any ISP that claims exactly 100/20 Mbps broadband since that conveniently classifies those locations as served. An ISP making that claim is telling the FCC that everybody in their service footprint already has adequate broadband and that there is no need to give grant money to anybody to compete with them.

But such a claim is ludicrous if the ISP is deploying a technology like DSL, cellular wireless, or fixed wireless where *it is impossible for every customer over a wide geographic area to get the ISP’s top claimed speed.*” (emphasis added)

### The bottom line:

Doug’s point is that the reported speeds affect BEAD funding.

- First, the funding allocation to the states is affected, as it is based on the number of locations lacking 25/3 Mbps.
- Then, the reported speeds affect whether locations are eligible to be funded.
- Where 100/20 Mbps is claimed to be available, **funding is not.**

**It should surprise no one** that there are plenty of 100/20 Mbps claims across the country, where 100/20 Mbps isn't actually delivered.

## A Closer Look



**I agree with Doug**, particularly that 100/20 Mbps claims by wireless providers should be met with skepticism. Both the FCC and NTIA could have done something about this known discrepancy between reported speeds and actual speeds.

- **The FCC** is the federal government's expert agency on telecommunications, manager of commercial spectrum, and responsible for the broadband maps used for BEAD. **The FCC knows better.**
- **NTIA** is the president's advisor on telecommunications policy, manager of government spectrum, and responsible for the implementation of the BEAD program. **NTIA knows better.**
- While the FCC and NTIA have chosen to do nothing, **states do not have to accept claims that are suspicious.**

In comments to Doug's blog, several fixed wireless providers take exception to Doug's essential point. **And in doing so, they prove Doug's point.**

As one commenter argues:

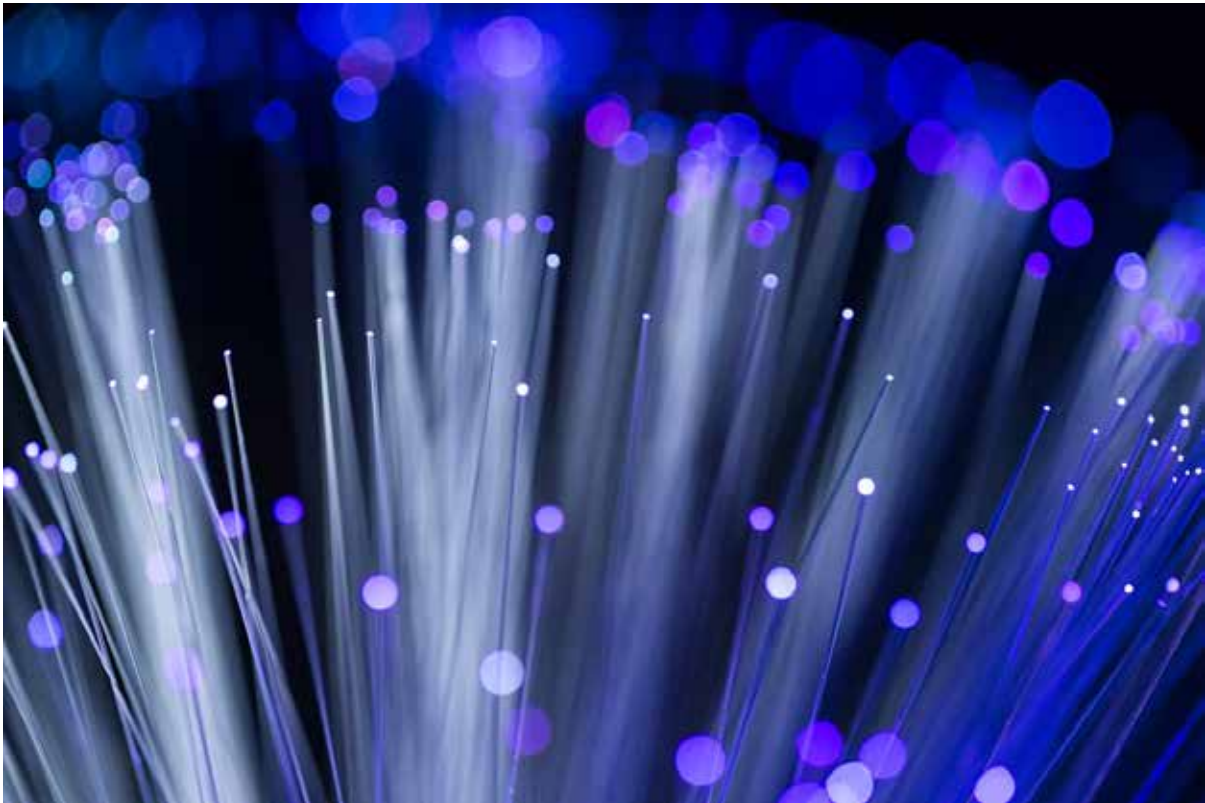
“If everyone in that coverage area subscribed to the 100/25, could we support that kind of usage? No... So playing totally by the rules, if I can deliver 100/25 (our fastest residential speed) **to any one single client** in our ‘FCC stated’ coverage area, then I am 100% within the confines of the system that was forced upon us. **Because oversubscription is real** and they left it completely off the discussion table.” *(emphasis added)*

**The bottom line:**

**Oversubscription is normal** engineering for broadband. But the point of a universal service program, like BEAD or those administered by the FCC, is that the **requisite service is available to every home and business.**

If an ISP can say that it cannot provide universal service, yet its broadband reporting to the FCC blocks funding to those who can – but it is still “playing totally by the rules” – **something's broken.**

## The Big Picture



When the FCC reviewed the technical information for RDOF winning bidders, it required each applicant to provide capacity planning, including oversubscription ratios. The language states:

“The information provided should demonstrate how the required performance for relevant performance tier will be achieved during periods of peak usage, downstream and upstream speed, and latency assuming a 70% subscription rate by the final service milestone.”

Fixed wireless providers reporting 100/20 Mbps service in rural areas do not typically assume a 70% subscription rate at their highest service tier during peak times.

**It may be unrealistic** for the FCC to have required such information in the Broadband Data Collection. But without such information, the maps will distort the BEAD program, and rural homes will suffer for the sloppiness in the government’s approach.

**What is to be done?**

**Where reporting is suspect**, it is not too late for the FCC, NTIA, or a state broadband office to investigate whether the reported service is available to every location.

**One possible fix:**

**In a state broadband program implementing BEAD**, whenever there is a single ISP in a rural area reporting 100/20 Mbps or slightly above, NTIA or a state broadband office could require the ISP to demonstrate:

1. How 100/20 Mbps is achieved during periods of peak usage
2. Actual downstream and upstream speeds
3. Low latency

All while assuming a 70% subscription rate, which is still less than universal service.

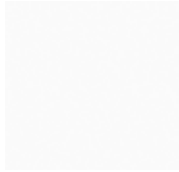
**Should the data suggest** to the state broadband office that 100/20 Mbps is **not** available to every location, it could declare that such an area is eligible for funding.

**Rural America gets one shot at this. *It is worth making the effort to get it right.***

*Feel free to forward this **Co-ops Connect FYI** to colleagues who want to stay in the know on all things broadband! Subscribe to Conexon's weekly newsletter [here](#).*

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