

Federal Communications Commission

Office of the Secretary

[45 L Street NE](#)

[Washington, DC 20554](#)

Filed via FCC ECFS: <https://www.fcc.gov/ecfs>

Re: WC Docket Nos. 19-195 and [11-10](#), GN

Docket No. 25-133; FCC 26-33 â€” Further

Notice of Proposed Rulemaking, Establishing the

Digital Opportunity Data Collection; Modernizing

the FCC Form 477 Data Program

[Regulations.gov](#) reference (record copy only; this

agency does not accept comments through

[Regulations.gov](#)): FCC-[2026-2476-0002](#)

Comment deadline: [July 24, 2026](#). Reply

comment deadline: [August 24, 2026](#).

To the Commission:

I am writing to formally object to the above-referenced Further Notice of Proposed Rulemaking, which proposes to eliminate or relax multiple broadband data collection requirements under the guise of reducing administrative burden. Rather than modernizing an outdated program, this proceeding would dismantle core accuracy safeguards that Congress deliberately built into the Digital Opportunity Data Collection system, and it would do so without the reasoned justification the law requires.

Congress enacted the Broadband Deployment Accuracy and Technological Availability Act, Public Law 116-130, specifically because the legacy Form 477 reporting system was found to overstate broadband availability and obscure service gaps in rural, tribal, and otherwise underserved communities. The Government

Accountability Office documented these deficiencies in its review of the Commission's mapping efforts, GAO-[21-104447](#), Broadband: FCC Is Taking Steps to Accurately Map Locations That Lack Access, which underscored that granularity and verification, not administrative convenience, are what make broadband maps usable for identifying unserved households. The proposals at issue here move in precisely the opposite direction: allowing providers to report "grandfathered" fixed broadband availability without revalidation, eliminating the requirement to report service below [25/3](#) Mbps, and eliminating disclosure of maximum buffer size data would each reintroduce the same reporting gaps that the Broadband DATA Act was passed to close.

Agencies proposing to depart from an existing regulatory framework must supply a reasoned

explanation grounded in the record, particularly where, as here, the framework was adopted to correct a documented factual problem. *Motor Vehicle Manufacturers Association v. State Farm Mutual Automobile Insurance Company*, 463 U.S. 29 (1983), requires an agency to examine the relevant data and articulate a satisfactory explanation for its action, including a rational connection between the facts found and the choice made; an unexplained assertion that a requirement is burdensome does not satisfy that standard, nor does it satisfy the notice-and-comment obligations of the Administrative Procedure Act, 5 U.S.C. Â§ 553(c), which require the Commission to respond meaningfully to the accuracy concerns this proceeding raises rather than simply asserting efficiency gains.

The proposal to relax the seven-meter antenna

height requirement used to model fixed wireless coverage areas raises a distinct and separate technical problem. Radio frequency propagation models used to predict fixed wireless service areas are highly sensitive to the assumed antenna mounting height, since a taller modeled antenna systematically extends the predicted line-of-sight range well beyond what typical residential or utility-pole installations actually achieve in the field. Loosening this modeling constraint without a corresponding empirical validation study risks systematically overstating predicted coverage in exactly the marginal, hard-to-serve areas that the National Broadband Map exists to identify, which would directly undermine the map's core purpose rather than modernize it.

The Commission's own notice acknowledges that eliminating legacy 3G mobile broadband

and mobile voice data collection would affect reporting for Alaska and for relevant Universal Service Fund programs, yet the proceeding does not meaningfully analyze that impact before proposing the change. Under 47 U.S.C. Â§ 254, the Commission is obligated to ensure that consumers in rural, insular, and high-cost areas have access to services reasonably comparable to those available in urban areas, and it cannot meet that statutory obligation while simultaneously removing its own visibility into where those services are absent. The same data also anchors the allocation of Broadband Equity, Access, and Deployment Program funding under the Infrastructure Investment and Jobs Act, so degrading its granularity risks misdirecting billions of dollars in public infrastructure investment away from the communities Congress intended it to reach. Section 706 of the Communications Act, codified at 47 U.S.C.

Â§ 1302, directs the Commission to encourage the deployment of advanced telecommunications capability to all Americans, particularly in unserved and underserved areas, and that mandate cannot be reconciled with a data collection framework of reduced granularity and reduced verification.

For these reasons, I urge the Commission to withdraw the proposals affecting sub-[25/3](#) Mbps reporting, buffer size disclosure, antenna height modeling, and legacy mobile and voice data collection, and to commission an independent accuracy assessment of the effects of any proposed changes before adopting them.

Administrative convenience for providers is not an adequate substitute for the data integrity that Congress required and that the public depends on to secure the infrastructure investment it was promised.

Respectfully submitted,

Concerned Citizen