



NOV 16 2007

The Honorable Daniel K. Inouye
Chairman, Committee on Commerce,
Science, and Transportation
United States Senate
Washington, D.C. 20510-1102

Dear Mr. Chairman:

I am writing to offer the Administration's views on S. 1492, the *Broadband Data Improvement Act*, which the Commerce Committee approved and reported to the Senate on October 24, 2007. The Administration supports efforts to improve the collection of data concerning the deployment of broadband communications throughout the United States, but objects to establishment of a new grant program with authorizations of \$200 million for FY 2008 through FY 2012.

S. 1492 takes a number of steps in the direction of improved broadband data collection, consistent with existing data collection efforts at the Federal Communications Commission (FCC). The FCC is provided appropriate flexibility to modify its existing data collection processes, particularly in determining the geographic level at which broadband providers must supply the requested data (for example, 5- or 9-digit zip code). This flexibility is important, as the FCC is continuing to examine means for improving its data collection efforts under current authority.

Although S. 1492 attempts to involve the States in the effort to improve broadband data collection, this could result in duplicative information requests from the States and the FCC that would increase costs and burdens for private sector respondents. Further, a number of states have begun or completed projects to map the deployment of broadband services in their jurisdictions. Therefore, the Administration believes it is unnecessary for Congress to create the grant program outlined in Section 6 of S. 1492 to encourage state initiatives to improve broadband deployment and use, and asks that this section be removed as the bill proceeds.

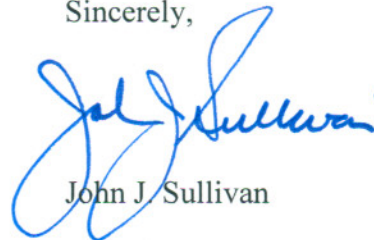
I also ask that you consider a revision to the language contained in Section 3(d) of S. 1492. Due to the mandatory requirement to respond and the very high respondent burden associated with the American Community Survey (ACS), the Census Bureau has established a rigorous process for adding new content to the ACS. From a practical standpoint, the Census Bureau must test through the ACS Methods Panel all proposed changes and additions to content. ACS funding requested in the FY 2008 President's Budget does not include monies for a content test. The Bureau's earliest plans for a content test are in FY 2011, with implementation of successful testing in FY 2013.

Given these factors, at a minimum, we would prefer a revision to the relevant bill language as indicated below:

“IMPROVING CENSUS DATA ON BROADBAND.—The Secretary of Commerce, in consultation with the Federal Communications Commission, shall consider expansion of the American Community Survey conducted by the Bureau of the Census to elicit information for residential households, including those located on native lands, to determine whether persons at such households own or use a computer at that address, whether persons at that address subscribe to Internet service and, if so, whether such persons subscribe to broadband Internet service at that address.”

Thank you for considering the Department’s views. If you have any questions, please contact me or Nat Wienecke, Assistant Secretary for Legislative and Intergovernmental Affairs, at (202) 482-3663. We have been advised by the Office of Management and Budget that there is no objection to the submission of this letter from the viewpoint of the Administration’s program.

Sincerely,



John J. Sullivan

cc: The Honorable Ted Stevens
Vice Chairman