Talking Points and Call to Action
on the FCC's National Broadband Map

Updated December 8, 2022

The Federal Communications Commission (FCC) revealed the first draft of its National Broadband Map in November 2022. Unfortunately, the map does not include internet availability information about most libraries and smaller community anchor institutions (CAIs). If these anchor institutions are not included on the map, they are unlikely to receive upgrades to their broadband connectivity as called for in federal legislation enacted last year.

The SHLB Coalition urges libraries and other anchor institution leaders to contact the FCC and their Congressional representatives to demand that CAIs be included in the next version of the broadband map.

Here are the details:

- Congress passed the Infrastructure Investment and Jobs Act (IIJA) in November 2021, providing $65 billion for broadband deployment and digital equity. Because of SHLB's work last year, the legislation says that CAIs that do not have gigabit connectivity are "unserved" and are eligible to receive upgrades to their broadband connections.

- Before this funding is distributed, the FCC must generate a map showing where broadband networks already exist, so funding can be targeted to unserved and underserved locations.

- Although most anchor institution locations are displayed on the map, they are grayed out and designated as not "broadband serviceable locations" because they do not purchase "mass market" broadband services. The SHLB Coalition told the FCC that this assumption is factually incorrect – many libraries and smaller anchors DO purchase regular "mass market" broadband service from Internet Service Providers (ISPs).

- As a result, ISPs do not have to report data on broadband availability to these institutions, which means the map will not show whether a CAI is served or unserved. This could mean that future investments to improve broadband connectivity will not include anchor institutions.

- The FCC Broadband Data Task Force told SHLB that the map is "locked in" and cannot be changed, even though the current map is in draft form and the FCC is expected to issue a new map early next year.

- The FCC also said that anchor institutions could file a "challenge" if they want to change their status on the map to "broadband serviceable". But the only way the map provides for an anchor institution to change its status is to change the "building type code" and certify that the anchor institution building is something other than an anchor institution, such as an "enterprise" (a business). This suggestion puts an anchor institution at risk of legal liability if it misrepresents itself as something other than an anchor institution.

- SHLB suggests that the default should be that all CAIs are designated ("flagged") as "broadband serviceable locations" unless an ISP shows otherwise as set forth the SHLB Coalition's filing with the FCC on Nov. 28, 2022. The burden to make this change should be on the industry, not on the anchor institution.

The SHLB Coalition urges libraries and other CAIs to go into the National Broadband Map, type in the addresses of their institutions, and, if the CAI is grayed out, take a screen shot of the map and provide this information to their Congressional representatives. The FCC is only likely to change the map if it receives messages from Congress that the FCC is not complying with Congressional intent in the IIJA.

Please let us know which Congressional offices you have contacted so that we can follow up with those offices.

For more information, please contact Kristen Corra, SHLB Policy Counsel, at kcorra@shlb.org.