

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Connect America Fund Phase II Auction)	AU Docket 17-182
FCC Form 683 Instructions)	WC Docket 10-90

To: Chief, Rural Broadband Auctions Task Force
Chief, Wireless Telecommunications Bureau
Chief, Wireline Competition Bureau

**COMMENTS OF
THE WIRELESS INTERNET SERVICE PROVIDERS ASSOCIATION**

The Wireless Internet Service Providers Association (“WISPA”) hereby comments in support of the Association of Federal Communications Consulting Engineers (“AFCCE”) Petition for Reconsideration (“Petition”).¹ AFCCE requests that the Commission clarify that the term “professional engineer” as it is used in the *Auction Closing Public Notice*² is not construed to be a *licensed* “Professional Engineer.”³ WISPA supports the Petition and asks that the Commission make any necessary clarification as soon as possible so that CAF Phase II recipients do not face uncertainty as they complete their long-form application requirements and retain professional engineers in advance of the November 5, 2018 deadline.

As the Petition correctly points out, the *Auction Procedures Public Notice* requires that a “network diagram must be certified by a professional engineer.”⁴ In its *Auction Closing Public*

¹ See Association of Federal Communications Consulting Engineers, Petition for Reconsideration, AU Docket No. 17-182, et. al (Sept. 2018) (“Petition”) at 1.

² See *Public Notice*, “Connect America Fund Phase II Auction (Auction 903) Closes; Winning Bidders Announced FCC Form 683 Due October 15, 2018,” AU Docket No. 17-182, et. al, DA 18-887 (Aug. 28 2018) (“*Auction Closing Public Notice*”).

³ See Petition at 1 (“a person licensed by a state or territory to practice engineering and/or provide professional engineering services to the public”).

⁴ *Public Notice*, “Connect America Fund Phase II Auction Scheduled for July 24, 2018 Notice and Filing Requirements and Other Procedures for Auction 903,” 33 FCC Rcd 1428, 1514 (Feb. 1, 2018) (“*Auction Procedures Public Notice*”).

Notice, the Commission explained that “[w]hile it is not necessary that the professional engineer have a Professional Engineer license, the certification should describe the professional engineer’s qualifications such that the certifier’s expertise is apparent.”⁵ AFCCE suggests that the Commission replace the term “professional engineer” with “qualified individual” to avoid confusion with the term “Professional Engineer” that implies that the certifying party has a business license.⁶

WISPA believes that the Commission was clear in stating that the certifying engineer need not hold a “Professional Engineer” license. However, to the extent the *Auction Closing Public Notice* does not make that clear or otherwise creates confusion, the Commission should make the suggested change as soon as possible. Most importantly, in light of the imminent November 5, 2018 deadline for submitting certified technical plans, WISPA does not want CAF auction winners to have any uncertainty over the credentials or qualifications of the party certifying to the technical design. Accordingly, the Commission should adopt any clarification at the earliest possible time.

Respectfully submitted,

**WIRELESS INTERNET SERVICE
PROVIDERS ASSOCIATION**

By: /s/ Claude Aiken
Claude Aiken, President/CEO

Stephen E. Coran
Lerman Senter PLLC
2001 L Street, NW, Suite 400
Washington, DC 20036
(202) 416-6744

Counsel to the Wireless Internet Service Providers Association

October 4, 2018

⁵ *Auction Closing Public Notice* at Appendix C.

⁶ *See* Petition at 5.