



March 7, 2019

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: NOTICE OF EX PARTE
WT Docket No. 10-208: *Universal Service Reform – Mobility Fund*
WC Docket No. 10-90: *Connect America Fund*

Dear Ms. Dortch,

In its February 26, 2019 *ex parte*, T-Mobile USA, Inc. (“T-Mobile”) claims that the *ex parte* filed by the Rural Wireless Association, Inc. (“RWA”) on February 13, 2019 contained false misrepresentations about the 4G LTE coverage information T-Mobile has provided to the FCC as part of the Commission’s Mobility Fund Phase II (“MF II”) challenge process. T-Mobile also claims that a Vermont Department of Public Service (“Vermont DPS”) report regarding wireless coverage in Vermont does not support RWA’s claims that T-Mobile has provided incorrect information about its MF II related coverage to the FCC. T-Mobile’s *ex parte* provides no basis for refuting RWA’s documented evidence of T-Mobile overstating its MF II wireless coverage and seeks to summarily discount the Vermont DPS’ report regarding T-Mobile’s MF II wireless coverage.¹

T-Mobile spends most of its six, single-spaced pages boasting of its consumer-facing maps.² However, these maps are completely irrelevant to the test results provided by both RWA and the Vermont DPS, all of which were based on mapping data submitted to the FCC by T-Mobile. Neither RWA nor the Vermont DPS compared their respective MF II drive testing results to T-Mobile’s marketing maps. RWA’s members’ drive testing results were compared to the confidential data submitted by T-Mobile in the FCC MF II portal and the Vermont DPS used T-Mobile’s FCC Form 477 broadband reporting data from December 31, 2017.

¹ In its report, Vermont DPS notes that it is nearly impossible to comport with the FCC’s MF II challenge data criteria because there are not enough roads in the right locations to take the measurements, so it instead focused on a more comprehensive drive test throughout the state.

² See T-Mobile *Ex Parte* pp. 1-4 (filed February 26, 2019).

Further, RWA has never claimed that T-Mobile used the same criteria for mapping MF II coverage (*i.e.*, 5 Mbps download speed) that it uses for its less robust consumer-facing maps on its public websites.³ RWA merely noted that its members, who have done extensive drive-testing, have experienced fail-rates above 90% when trying to achieve the 5 Mbps download speeds, and that the Vermont DPS experienced similar failure results in its own recent drive-testing.⁴

Contrary to T-Mobile's baseless assertion, RWA has absolutely no interest in further-delaying the MF II process. RWA members have gone to great lengths and expended considerable resources to ensure the veracity and truthfulness of the MF II mapping process and each day that passes prevents RWA members from having the opportunity to obtain funding to expand their 4G/LTE networks -- networks that are a precursor to 5G.

The Federal Communications Commission has set aside \$4.53 billion to build mobile broadband networks in rural America. T-Mobile's false claims of its LTE coverage in rural America have delayed the process of distributing those funds. Attempting to hoist the blame on RWA and its members is disingenuous when it is T-Mobile that has not been truthful about its LTE network coverage claims and such untruthful submissions that have caused unnecessary delay and expense to RWA and its members.

Respectfully submitted,

/s/ Caressa D. Bennet

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³ T-Mobile appears to be using this FCC proceeding to address concerns Congressman Peter Welch (D. VT) has raised with T-Mobile's consumer maps for his district. During a Congressional hearing held on February 13, 2019 by the House Energy and Commerce Committee's Subcommittee on Communications and Technology, Congressman Welch held up T-Mobile marketing maps and stated that they were "bogus," "no good," and "phony."

⁴ See, *e.g.*, [Universal Service Reform – Mobility Fund](#); WC Docket No. 10-90, WT Docket No. 10-208, [Informal Request of the Rural Wireless Association, Inc. for Commission Action](#) (Dec. 26, 2018); Letter to Marlene H. Dortch, WT Docket No. 18-197, WT Docket No. 10-208, WC Docket No. 10-90, from Caressa D. Bennet, February 13, 2019.