

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Connect America Fund)	WC Docket No. 10-90
)	
Universal Service Reform – Mobility Fund)	WT Docket No. 10-208
)	

OPPOSITION OF VERIZON¹

The Commission should deny the Rural Wireless Association (RWA) application for review of the *Challenge Procedures PN* because the changes proposed by RWA would reduce the accuracy of the challenge process and further delay the Mobility Fund auction.

In the *Challenge Procedures PN*,² the Wireless Telecommunications Bureau and Wireline Competition Bureau (the Bureaus) established procedures to implement the challenge process framework adopted by the Commission in the *MF-II Challenge Process Order*.³ Pursuant to those procedures, the Bureaus have overlaid a uniform grid of one square kilometer cells on a map of areas presumptively eligible for Mobility Fund support. During the challenge process, which began on March 29th, interested parties are able to challenge carriers' coverage

¹ The Verizon companies participating in this filing are the regulated, wholly owned subsidiaries of Verizon Communications Inc.

² *Procedures for the Mobility Fund Phase II Challenge Process*, Public Notice, DA 18-186 (WTB/WCB Feb. 27, 2018) (*Challenge Procedures PN*).

³ *Connect America Fund; Universal Service Reform – Mobility Fund*, Order on Reconsideration and Second Report and Order, 32 FCC Rcd 6282 (2017) (*MF-II Challenge Process Order*).

maps by submitting speed data from drive tests or application-based tests.⁴ Once the challengers submit their speed test data, the challenge process system will draw a “buffer” – a small circular area with a radius of one-quarter of a kilometer – around each speed test point.⁵ The system will then evaluate challenges on a grid cell-by-grid cell basis; a challenge to a grid cell is presumptively successful if the total buffered area in the cell exceeds 75 percent of the cell’s challengeable area.⁶

In its application for review, RWA argues that the Commission should (1) increase the size of the grid cells that define challenge areas from one square kilometer to one square mile; and (2) increase the buffer radius around a speed test from one-quarter of a kilometer to one-quarter of a mile. RWA claims that the Commission should base the challenge process on square miles instead of square kilometers because roads “in the majority of rural America” are situated on the borders of a one-square mile grid.⁷ According to RWA, its proposed changes would increase the number of grid cells that could be successfully challenged using drive testing alone.⁸ RWA contends that its proposal would produce a more accurate coverage map because the lower costs of drive testing would encourage more widespread challenges.⁹

Contrary to RWA’s claim, its proposal would produce a less – not more – accurate picture of coverage in rural America. The “buffer” approach adopted in the *Challenge Procedures PN* assumes that a speed test is representative of coverage within a circular area

⁴ *Challenge Procedures PN*, ¶17.

⁵ *Id.*, ¶ 37.

⁶ *Id.*, ¶ 38.

⁷ Application for Review of the Rural Wireless Association, WC Docket No. 10-90, WT Docket No. 10-208, March 29, 2018, at 3-4.

⁸ RWA AFR at 4.

around the point where the test was conducted, i.e., the buffer area. As the Bureaus recognized in the *Challenge Procedures PN*, that assumption is valid only if the buffer covers “a short distance around [the speed test] point.”¹⁰ With a larger buffer area, by contrast, “the less likely the results are to be similar to the results at the original point.”¹¹ Because RWA’s proposal to increase the buffer radius from one-quarter of a kilometer to one-quarter of a mile would dramatically increase the size of the buffer area,¹² it would be much less likely that a test point would provide a reliable proxy for coverage throughout the buffer area. Consequently, any coverage map based on the larger buffer areas proposed by RWA would be less accurate than a map based on the buffer areas adopted in the *Challenge Procedures PN*. Because RWA’s proposal would reduce the accuracy of the challenge process, the Commission should deny RWA’s application for review and affirm the Bureaus’ conclusion that a one-quarter kilometer buffer radius “strikes the appropriate balance” between the Commission’s interest in collecting data that accurately reflects consumers’ experiences and the burden on challengers.¹³

Not only would RWA’s proposal reduce the accuracy of the challenge process, but it would further delay the start of the Mobility Fund auction. In order to change the grid cell size, the Commission would have to stop the current challenge process – which is already well underway – and restart the challenge process from the beginning. All of the coverage maps

⁹ *Id.* at 3.

¹⁰ *Challenge Procedures PN*, ¶ 23.

¹¹ *Id.*, ¶ 23.

¹² The one-quarter mile radius buffer proposed by RWA would cover an area over 2.5 times greater than the one-quarter kilometer radius buffer adopted in the *Challenge Process PN*: a one-quarter mile radius buffer would have an area of about 0.5 square kilometers while a one-quarter kilometer radius buffer would have an area of about 0.2 square kilometers.

¹³ *Challenge Procedures PN*, ¶ 24.

currently loaded in the challenge process system, including the carrier-specific coverage maps and the map of presumptively eligible areas, are based on a one square kilometer grid. In order to implement RWA's proposal, the Commission would have to reprocess the carrier coverage maps using a one square mile grid, generate a new map of presumptively eligible areas, and finally direct USAC to modify its challenge process software to accept challenges based on one square mile grid cells. Stopping the current challenge process and then starting over with a one square mile grid would extend the challenge process -- and delay the start of the Mobility Fund auction -- by many months.

Because modifying the buffer radius and grid cell size would reduce the accuracy of the challenge process and delay the start of the Mobility Fund auction, the Commission should deny RWA's application for review.

Respectfully submitted,

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