

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

Petition for Waiver of The Kansas Farm
Bureau to Participate in Mobility Fund Phase
II Challenge Process

To: The Commission

**PETITION OF THE KANSAS FARM BUREAU
FOR WAIVER TO PARTICIPATE IN CHALLENGE PROCESS**

The Kansas Farm Bureau ("KFB") respectfully seeks a waiver to participate in the Mobility Fund Phase II ("MF-II") challenge process. KFB is neither a governmental entity nor a carrier required to file Form 477 data with the Commission; as such, it is not entitled to participate in the challenge process as a matter of right. In adopting the rule governing challenge eligibility, however, the Commission stated that it "anticipate[s] granting waivers in cases in which a . . . business demonstrates a bona fide interest in the challenge process and a plausible ability to submit a valid challenge."¹ As shown below, KFB meets these criteria.

KFB has a bona fide interest in the challenge process. KFB is an association organized under the Kansas Cooperative Marketing Act. KFB was formed in 1919 as a not-for-profit advocacy organization whose mission is to strengthen agriculture and the lives of Kansans through advocacy, education, and service. KFB is a grassroots organization with more than

Connect America Fund; Universal Service Reform – Mobility Fund, Order on Reconsideration and Second Report and Order, 32 FCC Rcd 6282, 6304 n. 119 (2017).

106,000 member families in all 105 counties in Kansas, of which approximately 36,000 participate in farming and ranching.

As an organization representing and advocating on behalf of our members in every county in the state of Kansas, KFB has an interest in promoting reliable 4G LTE service around the state. Our farm and ranch members increasingly rely in 4G LTE service while working in the fields with precision agriculture equipment that has the ability and the need to be able to communicate with service providers and advisors in distant locations. A rapidly growing number of farmers conduct the majority of their business through their phone. From checking grain prices and making sales to dealing with equipment breakdowns, 4G LTE is essential for today's average farmer. Moreover, farming and ranching is one of the most dangerous professions in the nation. Access to 4G LTE service in the remote locations where this work happens is essential to providing timely emergency services.

In addition, members of KFB across Kansas live, work, and raise families in communities of all sizes. They need reliable access to 4G LTE service to pursue educational endeavors, expand or launch business ventures, and connect with the broader world regardless of their proximity to population. Until a reliable wired broadband infrastructure connects all Kansans to the digital world, hotspots powered by 4G LTE are essential for students in rural areas to complete homework at home or participate in online learning environments.

KFB has a plausible ability to submit a valid challenge. With members located in every corner of the state, KFB is able to quickly identify potential problem areas that may be currently underserved by 4G LTE providers. With regional staff located throughout the state, KFB will be able to verify information provided by our members and relay it back to our headquarters to compile and remit to the Commission for use in the MF-II challenge process. We are aware of the handset requirements of the challenge process, and are prepared to meet them.

Additional information. The Commission requires waiver applicants to “submit the first and last name of the user(s) that should have access to the portal on its behalf, and the email address(es) of the user(s), up to a maximum of three users, as part of its petition for waiver.” KFB provides the following information regarding the users that should have access to the challenge process portal on its behalf:

Dan Strom (stromd@kfb.org)

Harry Watts (wattsh@kfb.org)

Wendee Grady (gradyw@kfb.org)

* * *

For all of these reasons, KFB respectfully requests a waiver to participate in the MF-II challenge process.

Respectfully submitted,

THE KANSAS FARM BUREAU

By: 
Richard Felts, President

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Submitted via email to mf2challengeprocess@fcc.gov, and to auction904@fcc.gov.