

June 18, 2019

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St. SW  
Washington, D.C. 20554

**Re: USTelecom Ex Parte Notice, WC Docket No. 10-90, *Connect America Fund*;  
WC Docket No. 11-10, *Modernizing the Form 477 Data Program*; WC Docket  
No. 19-126, *Rural Digital Opportunity Fund***

Dear Ms. Dortch:

On June 14, 2019, Patrick Halley, Senior Vice President of Policy & Advocacy for USTelecom (via phone) and I met with Preston Wise, Special Counsel to Chairman Pai. In the context of the Rural Digital Opportunity Fund, USTelecom explained the importance of its proposed Broadband Mapping Initiative<sup>1</sup> for an effective and efficient reverse auction. Without the accurate location of broadband serviceable locations that the Broadband Mapping Initiative will produce, a prospective bidder would not be able to determine if the location counts are correct in unserved census blocks, let alone where exactly the locations are, making bidding at scale extremely difficult. The result of these inaccuracies will produce two fundamental flaws: (1) some bidders underbidding and ultimately being unable to meet deployment obligations and (2) some bidders overbidding to hedge against concerns about their ability to meet deployment obligations based on imperfect information. Both of these outcomes are harmful to unserved consumers, ratepayers who support the Universal Service Fund, and the bidders themselves. And these outcomes are totally avoidable as neither issue would exist with the highly granular and accurate broadband serviceable location information that will emerge from the Broadband Mapping Initiative.

Adopting a granular broadband availability reporting mechanism will only be effective if it can be accurately moored to a map of where rural Americans actually live. The Broadband Mapping Initiative will allow the Commission to target support to *all* unserved locations in the Rural Digital Opportunity Fund. USTelecom also discussed that the Commission could consider the potential for near-term and long-term visions for how to best use Rural Digital Opportunity Fund support to close the digital divide in rural America.

Please contact me with any questions.

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<sup>1</sup> See, e.g., Letter of B. Lynn Follansbee, VP Law & Policy, USTelecom to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 10-90, 11-10 (Mar. 21, 2019).

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Sincerely,

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Mike Saperstein  
Vice President, Policy & Advocacy

cc: Preston Wise