

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

Petition for Wavier of Missouri Farm
Bureau to Participate in Mobility Fund
Phase II Challenge Process

To: The Commission

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

The Missouri Farm Bureau (“MOFB”) respectfully seeks a waiver to participate in the Mobility Fund Phase II (“MF-II”) challenge process. MOFB 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 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, MOFB meets these criteria.

MOFB has a bona fide interest in the challenge process. MOFB is a cooperation organized under The General Not for Profit Cooperation Law of Missouri. MOFB was formed in 1915 as a not-for-profit advocacy organization whose mission is to strengthen agriculture and the lives of Missourians through advocacy, education, and service. MOFB is a grassroots organization with more than 126,000 member families in all 114 counties in Missouri.

As an organization representing and advocating on behalf of members in every county in the state of Missouri, MOFB has an interest in promoting reliable 4G LTE service around the state. Our farm and ranch members 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 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 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 MOFB across Missouri 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 Missourians 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.

MOFB has a plausible ability to submit a valid challenge. With members located in every corner of the state, MOFB is able to quickly identify potential problem areas that may be currently underserved by 4G LTE providers. With regional staff located throughout the state, MOFB 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 the 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 wavier.” MOFB provides the following information regarding the users that should have access to the challenge process portal on its behalf:

Dan Cassidy (dcassidy@mofb.com)

BJ Tanksley (bj.tanksley@mofb.org)

Janie Dunning (janiedunning@hotmail.com)

For all these reasons, MOFB respectfully request a waiver to participate in the MF-II challenge process.

Respectfully submitted,
MISSOURI FARM BUREAU
By:

A handwritten signature in black ink, appearing to read "Blake Hurst". The signature is fluid and cursive, with the first name "Blake" and last name "Hurst" clearly distinguishable.

Blake Hurst, President
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July 6, 2018

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